

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION

- - -

NAUTILUS INSURANCE COMPANY, :
Plaintiff, : CASE NO.:
vs. : 2:22-cv-1307-RMG
RICHARD ALEXANDER MURDAUGH, :
SR.; CORY FLEMING; MOSS & :
KUHN, PA; CHAD WESTENDORF, :
AND PALMETTO STATE BANK, :
Defendants. :

CERTIFIED
TRANSCRIPT

DEPOSITION OF JOHN M. GRANTLAND, ESQUIRE

DATE TAKEN: Tuesday, March 12, 2024
TIME BEGAN: 10:01 a.m.
TIME ENDED: 2:28 p.m.
LOCATION: Maynard Nexsen
1230 Main Street, Suite 700
Columbia, South Carolina
REPORTED BY: Deidre Osborne, RPR

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1 A P P E A R A N C E S	I N D E X
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33 A P P E A R A N C E S	E X H I B I T S
34 (continued)	D E S C R I P T I O N
35	M A R K E D
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	E X H I B I T S (continued)	DESCRIPTION	MARKED	Page 6	Page 8
1					1 (It is hereby stipulated and agreed by and
2					2 between counsel for the respective parties that
3					3 this deposition is being taken in accordance with
4	22 Email Dated 3/25/2019		89		4 the Federal Rules of Civil Procedure and that the
5	23 Emails Dated 3/25/2019		91		5 deponent waives reading and signing of this
6	24 Email Chain		93		6 deposition transcript.)
7	25 Emails Dated 4/2/2019		94		7 - - -
8	26 Release		95		8 MR. LONG: I'm Jimmy Long. I represent
9	27 Petition for Approval of Settlement		95		9 John Grantland here as a -- he's a witness being
10	28 Order Approving Settlement		95		10 deposed today. Of course, John's a lawyer, and
11	29 Email Chain		99		11 so I just want to put on the record that
12	30 Letter Dated 4/22/2019		100		12 previously in regards to this matter that Alex
13	31 Copy of Check		102		13 Murdaugh had waived all privileges and all
14	32 Emails Dated 5/6/2019		104		14 privilege to John's representation of him, and as
15	33 Emails Dated 5/10/2019		106		15 a result, we've produced the entire file
16	34 Letter Dated 5/13/2019		109		16 including privileged communications. Nautilus
17	35 Order Approving Settlement Dated 5/13/2019		109		17 has also, I understand, waived the privilege
18	36 Email Chain		112		18 completely in regards to this action.
19	37 Email Dated 6/13/2019		118		I'd like Jaan or Clinton or somebody to
20	38 Email Chain		122		confirm that on the record for me.
21	39 Email Chain		123		MR. MAGILL: As long as it's not been
22	40 Order Approving Settlement Dated 5/13/2019		124		with a drop-down coverage issue, which he
23	41 Emails Dated 8/29/2021		126		shouldn't have anything to do with, I believe
24	(continued)				otherwise, this action has been waived.
25					MR. LONG: Well, how am I supposed to
	E X H I B I T S (continued)	DESCRIPTION	MARKED	Page 7	Page 9
1					1 know whether your -- the question involves the
2					2 privilege or not?
3					3 MR. MAGILL: Well, I would not think
4	42 Billing Entries		155		4 that Mr. Grantland would have any knowledge of
5	43 Letter Dated 11/14/2018		164		5 that. We were just commenting in the case as a
6	44 Email Dated 3/25/2019		172		6 whole. There is one issue that has been --
7	45 Emails Dated 5/10/2019		179		7 MR. LONG: He knows about that issue.
8	46 Email Chain		191		8 MR. MAGILL: We have a confidentiality
9	47 Stipulation of Dismissal Dated 10/5/2020		194		9 order on it, yeah.
10					10 MR. LONG: He knows about that issue.
11					11 He knows that was out -- that was well-known.
12					12 MR. MAGILL: Okay. Well --
13					13 MR. LONG: The fact that there was an
14					14 issue in regards to the -- are you talking about
15					15 the GAP?
16					16 MR. MAGILL: Yes.
17					17 MR. LONG: Yeah, he knows about that.
18					18 MR. MAGILL: So it's -- it's
19					19 confidential, not privilege. I apologize.
20					20 There's a order, I guess, or an agreement we
21					21 have. So the privilege is -- insofar as his
22					22 deposition has been waived, yes.
23					23 MR. LONG: Completely?
24					24 MR. MAGILL: Yes.
25					25 MR. LONG: Okay. There's also -- what's

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<p>1 y'all's position in regards to the mediation?</p> <p>2 Does he have the authority to answer questions</p> <p>3 regarding what occurred during the mediation?</p> <p>4 MR. MAGILL: Yes.</p> <p>5 MR. LONG: Everybody agree to that?</p> <p>6 MR. CLEMENT: Yes.</p> <p>7 MR. LONG: So y'all can ask him today,</p> <p>8 like, what happened during the actual mediation</p> <p>9 itself. Are -- are you prohibited from doing</p> <p>10 that under the ADR rules? I just want to give</p> <p>11 him -- I just want to make sure he doesn't</p> <p>12 stumble into something that people get upset</p> <p>13 about. I mean, obviously for us, our position</p> <p>14 would be he'd just rather -- he'd just like to</p> <p>15 answer the questions without having to worry</p> <p>16 about what he can and cannot say.</p> <p>17 MR. PENDARVIS: Maybe we can agree that</p> <p>18 the testimony is given subject to whether it's</p> <p>19 admissible at a later point for any of the</p> <p>20 proceedings.</p> <p>21 MR. LONG: And I would agree with that,</p> <p>22 that the -- I'm not sure whether any testimony</p> <p>23 about what happened in the mediation would be</p> <p>24 admissible in court. That would be something</p> <p>25 that would be up to the judge.</p>	<p>Page 10</p> <p>1 MR. LONG: -- careful about it.</p> <p>2 The -- and then, third, I would also say</p> <p>3 I'm not really aware of what your confidentiality</p> <p>4 order says, and we haven't really looked at that.</p> <p>5 I don't think it really applies to us. That's</p> <p>6 for y'all. All right? So in other words, if</p> <p>7 he -- y'all talk about anything today that you</p> <p>8 think should be confidential or whatever, under</p> <p>9 the court order in the case, it would be up to</p> <p>10 y'all to designate that or say that. Right?</p> <p>11 MR. PENDARVIS: Agreed.</p> <p>12 MR. LONG: I mean, John wouldn't have</p> <p>13 any obligation to --</p> <p>14 MR. PENDARVIS: Agreed.</p> <p>15 MR. CLEMENT: Agreed.</p> <p>16 MS. ALLEN: Agreed, yeah.</p> <p>17 MR. LONG: -- address that.</p> <p>18 Okay. Those were the things I wanted to</p> <p>19 kind of address before we started. I think we're</p> <p>20 ready.</p> <p>21 Are you ready?</p> <p>22 THE WITNESS: Uh-huh. I'm good.</p> <p>23 - - -</p> <p>24 JOHN GRANTLAND, ESQUIRE, after having been</p> <p>25 first duly sworn, was examined and testified as</p>
<p>1 MR. PENDARVIS: That --</p> <p>2 MR. LONG: Right?</p> <p>3 MR. PENDARVIS: I'd agree with that.</p> <p>4 And -- but it's -- and to the extent that</p> <p>5 questions are asked and answers are given, that</p> <p>6 doesn't waive the argument later to object to</p> <p>7 those being --</p> <p>8 MR. LONG: Uh-huh.</p> <p>9 MR. PENDARVIS: -- admitted into the</p> <p>10 court proceedings.</p> <p>11 MR. LONG: Everybody on the -- everybody</p> <p>12 agree with that?</p> <p>13 MR. MAGILL: Yes.</p> <p>14 MR. LONG: And --</p> <p>15 MR. PENDARVIS: And there is an</p> <p>16 exception in the ADR rules to confidentiality</p> <p>17 related to subsequent actions --</p> <p>18 MR. LONG: Uh-huh.</p> <p>19 MR. PENDARVIS: -- but we'll -- we'll --</p> <p>20 that all can be addressed later in --</p> <p>21 MS. ALLEN: Right.</p> <p>22 MR. PENDARVIS: -- some type of motion.</p> <p>23 MR. LONG: And I thought about that, but</p> <p>24 I'm just being --</p> <p>25 MS. ALLEN: Sure.</p>	<p>Page 11</p> <p>1 follows:</p> <p>2 - - -</p> <p>3 EXAMINATION</p> <p>4 - - -</p> <p>5 BY MR. PENDARVIS:</p> <p>6 Q. John, you -- for the record, Thomas</p> <p>7 Pendarvis. I'm representing Cory Fleming in this</p> <p>8 matter. I know you have taken hundreds of</p> <p>9 depositions and defended at least dozens.</p> <p>10 And are you familiar with the protocol for</p> <p>11 depositions?</p> <p>12 A. Yes, sir.</p> <p>13 Q. The rules do require that I say some of the</p> <p>14 things, and, of course, this is not an endurance</p> <p>15 contest. If you need to take a break at any point,</p> <p>16 please let me know.</p> <p>17 A. Yes, sir.</p> <p>18 Q. Okay. If you have any questions about the</p> <p>19 questions I pose, please redirect those back to me so</p> <p>20 that we can be clear. You're -- the only time you're</p> <p>21 permitted to discuss with your counsel anything is if</p> <p>22 there is a claim of privilege or confidentiality,</p> <p>23 but, otherwise, it's a conversation -- or a question-</p> <p>24 and-answer between the two of us. Agreed?</p> <p>25 A. Yes, sir.</p>

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<p style="text-align: right;">Page 14</p> <p>1 Q. Okay. Could you state your full name for 2 the record?</p> <p>3 A. John Martin Grantland.</p> <p>4 Q. John, what was your role in the claim that 5 was being made against Lloyd's of London and then 6 later Nautilus Insurance Company by Alex Murdaugh?</p> <p>7 A. So my role, I'm Lloyd's and Scott 8 Wallenger's counsel, and Nautilus hired us to defend 9 Alex Murdaugh -- to defend Alex in this -- in the 10 claim, the -- brought by the Satterfields.</p> <p>11 Q. Okay. And when did you first get involved?</p> <p>12 A. Not until, I think, November of '18. I 13 mean, I think the case was assigned to my partner, 14 J.R. Murphy, and when a decision was made that we're 15 going to try to go to mediation, I'm -- I'm -- I know 16 dog bite cases. I know the Fourteenth Circuit, so 17 I -- J.R. asked me to step in and take it from there.</p> <p>18 Q. And you mentioned dog bite cases. What do 19 you mean by that?</p> <p>20 A. You know, the -- just the traditional case 21 where you have a dog either attacks or -- bites or 22 otherwise attacks an -- you know, a person on a 23 property, and, you know, we have statutes that deal 24 with that, and when you represent homeowners' 25 carriers, like we do, we have a lot of dog cases</p>	<p style="text-align: right;">Page 16</p> <p>1 Q. -- let me go through a few key things just 2 by date and name, so -- and you tell me if I say 3 something that's -- that doesn't -- isn't consistent 4 with what you remember.</p> <p>5 My records, our records, show February 2, 6 2018, is when Ms. Gloria Satterfield fell on the 7 Moselle property owned by Alex and Maggie Murdaugh. 8 Is that correct?</p> <p>9 A. That's my understanding.</p> <p>10 Q. Okay. And she was taken to healthcare 11 facilities, and on February 26, 2018, Ms. Gloria 12 Satterfield died. Is that consistent?</p> <p>13 A. That's my understanding, yes, sir.</p> <p>14 Q. Okay. And at the time of the occurrence, 15 there were two policies on the property, correct?</p> <p>16 A. I think Alex was insured through Lloyd's and 17 an excess policy or umbrella through Nautilus.</p> <p>18 Q. Okay. So that was the -- the Lloyd's policy 19 was a \$500,000 policy?</p> <p>20 A. That's my understanding.</p> <p>21 Q. And that was the primary policy.</p> <p>22 A. Right.</p> <p>23 Q. And Lloyd's was a excess policy for 5 24 million per occurrence?</p> <p>25 A. Nautilus, yes, sir.</p>
<p style="text-align: right;">Page 15</p> <p>1 ranging from bites to attacks or all kind of things.</p> <p>2 Q. Did you -- there was a memo in the file from 3 Konnor Owens. Who is Konnor?</p> <p>4 A. He was a law clerk.</p> <p>5 Q. Okay. Well, let me -- let me step back --</p> <p>6 A. Yeah.</p> <p>7 Q. -- a little bit before we get into the 8 details.</p> <p>9 A. Uh-huh.</p> <p>10 Q. So in the initial phases of your and 11 Mr. Murphy's representation of Mr. Murdaugh on behalf 12 of the carrier, Nautilus, could you -- what were you 13 doing? Claim investigation?</p> <p>14 A. Yes. I mean, we were -- I mean, by the time 15 it came to me, it was like we were -- we were -- a 16 decision had been made to go to mediation, and we're 17 going to at least investigate all of our defenses, 18 defenses on -- well, defenses regarding what happened 19 and -- and her -- and why she fell and -- and her -- 20 her injuries --</p> <p>21 Q. Okay.</p> <p>22 A. -- and...</p> <p>23 Q. Well, so just for -- so you and I are on the 24 same page for chronology of events --</p> <p>25 A. Sure.</p>	<p style="text-align: right;">Page 17</p> <p>1 Q. Nautilus. Excuse me.</p> <p>2 A. Yeah, yeah.</p> <p>3 Q. I apologize for that.</p> <p>4 Did you have an understanding when Alex 5 Murdaugh reported the claim?</p> <p>6 A. No.</p> <p>7 Q. I'm going to skip over a few things that 8 we'll probably come back to, but when you got 9 involved, did you review the file materials that 10 Mr. Murphy had as part of your --</p> <p>11 A. Yes.</p> <p>12 Q. -- representation?</p> <p>13 Okay. And did you review all of the 14 communications and investigation materials that had 15 been developed while Mr. Murphy was handling the 16 investigation?</p> <p>17 A. Yes. I assume I would.</p> <p>18 Q. Okay. In reviewing the materials, I'm just 19 going to, you know --</p> <p>20 A. Uh-huh.</p> <p>21 Q. -- generically describe some of this, but it 22 appears that there were investigations of one of the 23 dog trainers. Is that --</p> <p>24 A. That's my understanding about -- Scott 25 Wallenger may have done -- he -- I know Scott went to</p>

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1 the property and did a lot of interviewing and a lot
2 of -- a lot of the hands-on initial interviewing of
3 what happened -- of investigation of what happened,
4 and he shared his information with us.

5 Q. Okay. So in addition to -- and so there was
6 some investigation about the dogs and the dog
7 training for the -- I think there were --
8 A. That's my understanding.

9 Q. -- four dogs on the property --
10 A. I think so.

11 Q. -- that day?
12 A. Uh-huh. I think so.

13 Q. Of the February 2nd day of the incident?
14 And there was also a significant evaluation
15 of Ms. Gloria Satterfield's medical condition,
16 correct?
17 A. Yes, sir.
18 Q. I mean --
19 A. I was involved in that.
20 Q. -- pharmaceuticals, all the treatments and
21 what have you --
22 A. Yes, sir.
23 Q. -- prior to the fall. Is that -- was that
24 part of the investigation?
25 A. Well, we -- we -- you know, we requested all

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1 you involved in getting the personal representative's
2 estate established or --
3 A. No.
4 Q. -- the successor personal representative
5 established?
6 A. No. Huh-uh.
7 Q. Okay. And same for Mr. Murphy.
8 A. Right. We would not have anything to do
9 with that.
10 Q. Okay. How about, were either of you, you or
11 Mr. Murphy, involved in getting anyone appointed as
12 conservator for any of the beneficiaries of the
13 estate?
14 A. No.
15 Q. Okay. At any point.
16 A. No.
17 Q. Okay.
18 A. I mean, I was told that when we -- when we
19 were -- when we were -- when we had settled for a
20 number, I was told that there would be a conservator
21 for the Satterfield -- the Satterfield son who was
22 special needs.
23 Q. Okay. Did you do any interviews of Alex
24 Murdaugh that were part of the claim evaluation
25 process?

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1 of her primary care records, and the records that we
2 were aware of, we requested from -- from Cory so that
3 we could evaluate her condition prior to the fall and
4 afterward, obviously.

5 Q. And it sounds as though, John, from when --
6 when you got involved that there had been a demand on
7 Lloyd's for a policy limit, and Lloyd's had indicated
8 an intent to tender policy limits prior to your
9 involvement. Is that correct?
10 A. That's my -- my understanding.
11 Q. Okay.
12 A. And actually did tender.
13 Q. And did tender. Okay.
14 A. Uh-huh.
15 Q. By the time of your involvement, Mr. Chad
16 Westendorf was the successor personal representative
17 of Gloria Satterfield's estate?
18 A. I believe so.
19 Q. Okay.
20 A. I mean, I -- that's -- you know, that's my
21 understanding. He was -- it may have been one of the
22 Satterfield boys initially, and then it was
23 Mr. Westendorf, but I don't -- but by the time I was
24 involved, it was Mr. Westendorf.
25 Q. And were you aware of Mr. Murphy -- or were

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1 A. I'm sure I did. We talked a lot, at least,
2 you know -- but by the time I was involved, it was
3 about scheduling a mediation, and we certainly --
4 I -- we -- he told me his -- what -- what -- he told
5 me what happened and -- and, yeah. So we had a
6 number of phone calls about it.
7 Q. Okay. What -- and there were prior notes in
8 the file here by Mr. Wallenger or others with
9 Nautilus about statements Mr. Murdaugh had made about
10 the claim when it was reported, correct?
11 A. Yes, sir. That's right.
12 Q. Okay. And these -- what -- your
13 conversations you're describing were months
14 afterwards --
15 A. Right.
16 Q. -- where you're basically getting ready for
17 a mediation.
18 A. Right.
19 Q. Okay. Did you interview anyone besides Alex
20 Murdaugh?
21 A. No. That's -- I mean, I -- I had -- I hired
22 two doctors to -- and gave them, Dr. Pritchard and
23 Dr. Westerkam -- and gave them records and talked to
24 them and reported their findings to -- to Nautilus.
25 Q. Did you have any discussions with Maggie

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<p>1 Murdaugh?</p> <p>2 A. No. Never talked to her.</p> <p>3 Q. How about any discussions with Paul</p> <p>4 Murdaugh?</p> <p>5 A. No.</p> <p>6 Q. Did you see the notes in the file about</p> <p>7 statements they had made --</p> <p>8 A. Yes.</p> <p>9 Q. -- about the events?</p> <p>10 A. Yes.</p> <p>11 Q. Both Paul and Maggie?</p> <p>12 A. Right. From Scott Wallenger.</p> <p>13 Q. We're going to get into a few of the</p> <p>14 documents, and these aren't too voluminous, and there</p> <p>15 are a few that we may be able to skip over that were</p> <p>16 provided earlier, but in general when you -- when the</p> <p>17 decision had been made to mediate -- let me rephrase</p> <p>18 that.</p> <p>19 Had the decision to mediate been made before</p> <p>20 you got directly involved?</p> <p>21 A. Yes.</p> <p>22 Q. Okay. So your instructions were basically,</p> <p>23 "Let's get this claim settled"?</p> <p>24 A. Yes. Let's work with Amy on -- in doing</p> <p>25 what we can do to -- to -- and do whatever</p>	<p>Page 22</p> <p>1 it's from Mr. Konnor Owens to J.R. Murphy dated July</p> <p>2 11, 2019. Is this the dog bite research --</p> <p>3 A. Right.</p> <p>4 Q. -- you have mentioned earlier?</p> <p>5 A. Yes.</p> <p>6 Q. And, I mean, the -- I'll tell you what.</p> <p>7 I'll let you do it.</p> <p>8 Could you read the answer to the questions</p> <p>9 right under the --</p> <p>10 A. You mean --</p> <p>11 Q. -- bold?</p> <p>12 A. Yeah. "South Carolina's dog bite statute</p> <p>13 does impose strict liability in cases where the</p> <p>14 injury was caused by the dog jumping on the injured</p> <p>15 party."</p> <p>16 Q. So the strict liability issue was a concern</p> <p>17 as part of the claim evaluation was maturing,</p> <p>18 correct?</p> <p>19 A. Right.</p> <p>20 MR. PENDARVIS: Okay. Off the record</p> <p>21 for just a second.</p> <p>22 - - -</p> <p>23 (A discussion was held off the record.)</p> <p>24 - - -</p> <p>25 (Nautilus Internal Notes marked Exhibit Number 2</p>
<p>1 investigation we can do regarding her damages and to</p> <p>2 get the best settlement we can for Alex.</p> <p>3 Q. And by Amy, you mean Amy Coryer Miller; is</p> <p>4 that --</p> <p>5 A. Yeah, Amy Miller, the adjuster.</p> <p>6 Q. Okay. She was your primary contact --</p> <p>7 A. Yes.</p> <p>8 Q. -- at Nautilus --</p> <p>9 A. Yes.</p> <p>10 Q. -- Amy Miller?</p> <p>11 A. Yeah.</p> <p>12 Q. Okay. I'll tell you what. It might be just</p> <p>13 easiest to move into some exhibits now. I'm</p> <p>14 basically going in the order that they were produced</p> <p>15 in that file that you guys had some problems opening</p> <p>16 up, so I'm going to show a few exhibits to you, John.</p> <p>17 A. Okay.</p> <p>18 - - -</p> <p>19 (Memorandum Dated 7/11/2018 marked Exhibit Number</p> <p>20 1 for identification.)</p> <p>21 - - -</p> <p>22 BY MR. PENDARVIS:</p> <p>23 Q. Going backwards a little bit, John, this was</p> <p>24 a memo or may even have been just part of a memo, but</p> <p>25 this was a memo in the file that was produced, and</p>	<p>Page 23</p> <p>1 for identification.)</p> <p>2 - - -</p> <p>3 MR. PENDARVIS: Okay. Back on the</p> <p>4 record, please.</p> <p>5 BY MR. PENDARVIS:</p> <p>6 Q. Mr. Grantland, I'm passing you a document</p> <p>7 that's marked as Exhibit 2 to your deposition. It</p> <p>8 appears to be some internal -- Nautilus internal</p> <p>9 notes that were produced in this case. Were these</p> <p>10 materials available to you --</p> <p>11 A. No. I --</p> <p>12 Q. -- when you were representing Mr. Murdaugh?</p> <p>13 A. I haven't seen this document before until I</p> <p>14 knew it was going to be an exhibit to my deposition.</p> <p>15 Q. Okay.</p> <p>16 MR. RANNIK: Tom, sorry to interrupt.</p> <p>17 This is Jaan Rannik. Could I ask you just to</p> <p>18 reference the Bates numbers --</p> <p>19 MR. PENDARVIS: Sure.</p> <p>20 MR. RANNIK: -- of the exhibits once you</p> <p>21 go in for the clarity on the record?</p> <p>22 MR. PENDARVIS: I'll do my very best for</p> <p>23 that, Jaan. This is Nautilus_000771 through 772.</p> <p>24 MR. RANNIK: Thank you.</p> <p>25 MR. PENDARVIS: Do you need to -- since</p>

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<p style="text-align: right;">Page 26</p> <p>1 we're just at Exhibit 2, let me -- I can tell you 2 what Exhibit 1 is just so you'll have that. 3 MR. RANNIK: No worries on Exhibit 1. 4 And the only reason that I'm even asking is 5 because some of these documents were produced as 6 confidential. We're probably going to have to go 7 back and designate some portions either of the 8 exhibits or of the testimony as confidential, and 9 so I just want to, for ease of reference, be able 10 to point to them, but for Number 1 we're good. 11 Thank you. 12 MR. PENDARVIS: Okay. Well, I'll do my 13 best to keep that on the record as we proceed. 14 MR. RANNIK: Thank you. 15 - - - 16 (Email Dated 11/12/2018 marked Exhibit Number 3 17 for identification.) 18 - - - 19 BY MR. PENDARVIS: 20 Q. John, I'm passing to you now another exhibit 21 marked as Exhibit Number 3 to your deposition, and 22 this is Nautilus_000255. It appears to be an email 23 from Mr. Murphy to Ms. Miller dated November 12, 24 2018. 25 The first line of the -- of the first</p>	<p style="text-align: right;">Page 28</p> <p>1 BY MR. PENDARVIS: 2 Q. This is marked as Deposition Exhibit Number 3 4. 4 A. Right. 5 Q. It's a letter dated November 12, 2018. 6 A. Right. 7 MR. PENDARVIS: And for those on the -- 8 and for the record, it's Nautilus_002323 9 continuing to Nautilus_002325. 10 BY MR. PENDARVIS: 11 Q. And is that the letter from Mr. Rheney you 12 were just describing? 13 A. Yes. 14 Q. And did you -- at some point in your 15 representation before the mediation, you were able to 16 review this document? 17 A. I think so. You know, I was -- it wasn't 18 written to me, and I'm not sure how it -- if it was 19 sent by Amy to J.R., but, I mean, I know I've read 20 it. When I've read it, I can't tell you. 21 Q. And stepping back a little bit for a big 22 picture, the estate of Gloria Satterfield was being 23 represented by Cory Fleming, correct? 24 A. That's correct. 25 Q. And did you know Cory before this --</p>
<p style="text-align: right;">Page 27</p> <p>1 sentence in the exhibit explains Ms. Miller's belief 2 that they're fully expecting to receive a policy 3 limit time-limited demand from -- so from the outset 4 of the case, it was clear that was coming, correct? 5 A. Yes, sir. Absolutely. 6 Q. And below -- the itemized list below are 7 basically medical records that were needed to better 8 evaluate the claim; is that correct? 9 A. That's correct. 10 Q. As part of the representation, did you see 11 correspondence from Mr. Wallenger's firm to 12 Ms. Miller about the Nautilus position on the claim? 13 A. I'm sure I did. I'm -- I know I saw Scott's 14 letter, his investigation of what happened and who he 15 interviewed and his -- his evaluation, and I've seen 16 the letter from Attorney Rheney. I don't know when I 17 saw that letter, but -- but I'm -- I've seen that 18 letter before. 19 Q. Okay. I'm going to pass to you -- 20 A. Yeah. 21 Q. -- a copy of that letter. 22 - - - 23 (Letter Dated 11/12/2018 marked Exhibit Number 4 24 for identification.) 25 - - -</p>	<p style="text-align: right;">Page 29</p> <p>1 A. I did. 2 Q. -- claim? 3 A. I did. We've had cases together. 4 Q. Okay. And could you describe your 5 relationship with Cory? 6 A. Just, you know, cordial, professional. 7 Q. This letter -- and I'll let you -- if you'd 8 like to look at it. On page 2 of the letter, the -- 9 let's see, the second full paragraph includes some 10 concerns or descriptions, I should say, about 11 Mr. Murdaugh's reputation in Hampton County and the 12 Lowcountry. Is it fair to say that was a concern of 13 how this whole lawsuit would play out if there was a 14 lawsuit? 15 A. Yes. 16 Q. And so for the insured's benefit, that was a 17 risk that Nautilus was aware of. 18 A. Absolutely. 19 Q. Did -- were there any discussions with 20 Ms. Miller about the likelihood of a verdict if this 21 case was -- if were litigated and what this -- what 22 may happen, what a jury might do for the claim? 23 A. Yes. 24 Q. Describe -- tell me what those conversations 25 were about.</p>

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<p style="text-align: right;">Page 30</p> <p>1 A. I mean, when we were evaluating the case, 2 you know, Hampton, Allendale, the Fourteenth Circuit 3 is not like every other county in South Carolina, and 4 we discussed prior verdicts in Hampton. I had a 5 PowerPoint that Mark Tinsley had provided me on a 6 case years before from cases he and Woody had tried 7 down there, just astronomical verdicts on nominal 8 damages, and I shared that with them, and so -- and, 9 you know, with \$700,000 in medical bills -- and if 10 Alex is admitting fault, I mean, the verdict could -- 11 could exceed his coverage, so we -- we definitely had 12 discussions about the danger of having a case down in 13 Hampton --</p> <p>14 Q. Okay.</p> <p>15 A. -- or a trial in Hampton.</p> <p>16 Q. Did decisions by Lloyd's to tender policy 17 limits have any effect on decisions Nautilus was 18 making about whether to resolve the claim?</p> <p>19 A. I don't -- I just know that it was highly 20 unusual for an insurance company to tender \$500,000 21 with no strings other than a promise that we'll 22 mediate and we won't file suit until we mediate. So 23 I've never had this -- I've never had a case like 24 this before.</p> <p>25 Q. No covenant not to execute?</p>	<p style="text-align: right;">Page 32</p> <p>1 Mr. Wallenger that you mentioned earlier.</p> <p>2 A. That's right.</p> <p>3 Q. Similar to Exhibit 4, is this another letter 4 that you would have reviewed before the mediation?</p> <p>5 A. Yes.</p> <p>6 Q. Okay. Were there any -- you reviewed all 7 these materials with your lawyer before the 8 deposition?</p> <p>9 A. Yes.</p> <p>10 Q. I'm trying to save some time here.</p> <p>11 A. Yeah. Thank you.</p> <p>12 Q. Were there anything -- any of the contents 13 of Exhibit 5 that you remember reviewing and having a 14 question about or concerns?</p> <p>15 A. No. I mean, I'm sure I talked to Scott 16 about it, but -- but -- but, no.</p> <p>17 Q. Did any of you interview any of the 18 Satterfield family members?</p> <p>19 A. No.</p> <p>20 Q. We've seen references in a few of these 21 materials where reports were that Maggie, for 22 instance, heard from some Satterfield family members 23 that a dog was involved in the fall. Do you recall 24 seeing that?</p> <p>25 A. I do.</p>
<p style="text-align: right;">Page 31</p> <p>1 A. No -- no protection.</p> <p>2 Q. That is pretty unusual.</p> <p>3 And so if I were -- just I'm -- I'm making 4 clear that -- on your testimony about this particular 5 November 12, 2018, letter. You believe you saw it at 6 some point. You just don't recall when in the -- in 7 the course of your representation that you reviewed 8 this.</p> <p>9 A. Right.</p> <p>10 Q. But it was prior to the mediation.</p> <p>11 A. I assume it was prior to the mediation, but, 12 you know, it's -- you know, the -- but I can't say 13 100 percent, but I assume it was because all -- you 14 know, this is -- this is all information we knew. 15 None of this was a secret.</p> <p>16 -- -</p> <p>17 (Second Comprehensive Report Dated 11/6/2018 18 marked Exhibit Number 5 for identification.)</p> <p>19 -- -</p> <p>20 BY MR. PENDARVIS:</p> <p>21 Q. Mr. Grantland, I believe you mentioned this 22 earlier, but I'm passing to you now a document marked 23 as Exhibit 5 of this deposition, and it's -- bears 24 Bates numbers Nautilus_002303 continuing through 25 Nautilus_002314. I believe this is the letter from</p>	<p style="text-align: right;">Page 33</p> <p>1 Q. And did anyone interview any of the 2 Satterfield family members to confirm or verify that?</p> <p>3 A. No. I mean, they're -- they're represented 4 by Cory, and that's not something we would -- we 5 would do.</p> <p>6 Q. Okay. Did you ask Mr. Fleming for --</p> <p>7 A. No.</p> <p>8 Q. -- a chance to take a statement from any of 9 these --</p> <p>10 A. No.</p> <p>11 Q. Okay.</p> <p>12 A. I mean, the assumption was Alex had said, 13 "She told me the dogs tripped her up," and that's -- 14 that was the main -- that was the evidence we were 15 going on.</p> <p>16 Q. Okay. And you -- there were private 17 investigators that followed the Satterfield boys, 18 right?</p> <p>19 A. I don't know anything about that.</p> <p>20 Q. Did you -- did you see in the claim files 21 any of the private investigators --</p> <p>22 A. No, not at all.</p> <p>23 Q. Okay. You weren't involved --</p> <p>24 A. I mean, no.</p> <p>25 Q. -- in the order?</p>

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<p style="text-align: right;">Page 34</p> <p>1 A. I think we -- we wanted -- at some point, we 2 wanted to try to interview the EMS workers who came 3 on the scene, and we called them, and they said, 4 "We're not talking to you."</p> <p>5 And I told Ms. Miller that they're not going 6 to talk to us, and I think she may have hired an 7 independent adjuster to speak to them, but -- but, 8 no, we didn't hire any PIs or anything like that.</p> <p>9 Q. Okay. If you would, John, take a look at -- 10 I think this is page 6 of the letter. Pages 5 and 6. 11 Excuse me. Pages -- well, actually, pages 5 and 6 12 and 7 appear to have Mr. Wallenger's notes on his 13 interviews with Alex Murdaugh, Maggie Murdaugh and 14 Paul Murdaugh.</p> <p>15 A. That's correct.</p> <p>16 Q. Did you have any conversations with Scott 17 Wallenger prior to the mediation --</p> <p>18 A. Yes.</p> <p>19 Q. -- about the investigation he had done?</p> <p>20 A. Yes.</p> <p>21 Q. Tell me about that conversation.</p> <p>22 A. I mean, just -- just, you know, confirming, 23 you know, his -- you know, everything he had done, 24 and, you know, he -- he thoroughly investigated 25 whether a dog was involved, what evidence was a dog</p>	<p style="text-align: right;">Page 36</p> <p>1 Q. Okay.</p> <p>2 A. And I don't know where -- I don't know where 3 they got -- the Satterfield relatives got that 4 information, but, I mean, it could have been gotten 5 from Ms. Satterfield while she was awake in the 6 hospital, but, you know --</p> <p>7 Q. That's what I was thinking too.</p> <p>8 A. Yeah.</p> <p>9 Q. What about the next -- the statement on the 10 next page, page 8? And this is the comments about 11 his interview with Paul Murdaugh, and it says -- 12 midway through that bolded paragraph, it says, "Paul 13 remembers that his father, Alex, arrived and asked 14 what happened and that Satterfield, quote, 'Said 15 something about the dogs,' close quote."</p> <p>16 Similarly, did -- was that a material 17 consideration in Nautilus's decision about --</p> <p>18 A. I mean, it was consistent. I guess, it -- 19 you know, it was -- it was all consistent with what 20 Alex had said. I mean, this -- this is consistent 21 with what Alex said, and it's consistent with what 22 Maggie said. But I didn't interview Paul or Maggie. 23 The only information I had would have been from 24 Scott.</p> <p>25 Q. What about -- let's go back a page or two on</p>
<p style="text-align: right;">Page 35</p> <p>1 involved in the -- in Ms. Satterfield's fall, and, I 2 mean, I did more investigation into what was the 3 cause of her death and what evidence from the medical 4 side was there of whether a dog was involved or 5 whether the fall caused her to die, and so that's -- 6 he did the liability piece, and I did more of the 7 damages piece.</p> <p>8 Q. Did he have any conclusions? We see his 9 statements.</p> <p>10 A. Yeah.</p> <p>11 Q. Did he have any summary conclusions about 12 whether he really thought the dogs were involved or 13 not?</p> <p>14 A. I mean, we both -- Alex was the only 15 evidence that the dogs were involved at the end of 16 the day. I mean, that's -- that was his -- his 17 testimony was the only evidence, and he was adamant.</p> <p>18 Q. No one relied on the statements, I think, on 19 page 7 of the letter where it says, "Maggie said that 20 the Satterfields' relatives told Maggie that, quote 21 'The dogs tripped Gloria up'?"</p> <p>22 A. Yeah. That's -- yeah. I know that most 23 important to me was what Alex said. I didn't 24 interview any of the Satterfield relatives. I 25 just -- nor did I interview Maggie.</p>	<p style="text-align: right;">Page 37</p> <p>1 to page 6. There was some things we'll look at later 2 about some documents about no one said they saw dogs 3 there. The first responders, I'll call it.</p> <p>4 A. Right.</p> <p>5 Q. The medical folks.</p> <p>6 What about the statement in Mr. Wallenger's 7 letter under "Maggie Murdaugh," really the last 8 sentence in his -- one, two -- third paragraph where 9 it says, "Maggie put all the dogs inside the house"?</p> <p>10 A. That is -- that was my understanding, that 11 the dogs were put up by the time EMS arrived.</p> <p>12 Q. Okay. So when they got there, there 13 wouldn't have been any dogs --</p> <p>14 A. Right.</p> <p>15 Q. -- to look at.</p> <p>16 A. Right.</p> <p>17 Q. Okay. Mr. Grantland, before I show you an 18 email about a report concerning Brett Lawson, the dog 19 trainer, just, you know, big picture. There were 20 considerations about whether the dog trainer may have 21 some responsibility with -- if the dogs had been 22 involved, whether the dog trainer -- lack of training 23 may have had some causal link to this. Is that fair?</p> <p>24 A. I think that would have been Lloyd's 25 investigation. By the time it got to me, that was</p>

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1 not -- we were not thinking about making a claim
2 against the dog trainer.

3 - - -
4 (Email Chain 11/27/2018 marked Exhibit Number 6
5 for identification.)
6 - - -

7 BY MR. PENDARVIS:

8 Q. Okay. I'm going to pass to you a copy of a
9 document marked as Exhibit 6. This one is
10 Nautilus_000287 through 288. Marked as Exhibit 6.
11 And I didn't include the report itself.

12 A. Right.

13 Q. But do I understand from the content of the
14 email at the bottom half of page 1 of Exhibit 6 that
15 that report had been developed either by Lloyd --
16 someone on behalf of Lloyd's or someone internal to
17 Nautilus, and it was provided to you and J.R.,
18 Mr. Murphy?

19 A. Right. Yeah. And I don't recall seeing the
20 report. It -- and so -- but I know that that was --
21 I know that was -- the -- looking at the dog trainer
22 was done by -- when Scott was -- Scott was the first
23 person -- first lawyer to be investigating the -- the
24 incident. I know that was one of the issues, and I
25 think maybe this was just -- I don't -- I don't know

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1 her. Was this the cause -- did this cause her death?
2 And that -- I mean, that's -- I mean, it wasn't
3 about -- for Dr. Pritchard, it was all about the
4 neurological issues: What was her injury, and what
5 effect did it have on her? Did it lead to her
6 demise?

7 Q. We're going to look at some documents --

8 A. Yeah.

9 Q. -- about Dr. Pritchard, but -- and I just
10 want to make sure I understand this. And so
11 Dr. Westerkam was more involved on the medication and
12 some of her history issues and whether that
13 contributed?

14 A. Well -- and, yes. It was a -- he's more of
15 an internist, and it was, like, what was her state of
16 health, and what was the cause of death? Did the
17 fall cause her to die, or did something else cause
18 her to die? That was kind of the purpose of having
19 Dr. Westerkam.

20 Q. Okay.

21 A. And what meds was she on? What conditions
22 did she have? Would that have contributed to her
23 fall?

24 - - -

25 (Letter Dated 1/7/2019 marked Exhibit Number 7

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1 who hired the independent adjuster, whether Nautilus
2 did or Lloyd's, but --

3 Q. Okay. Okay. And the -- I did see some
4 reference to Bourbon -- the dog, Bourbon --

5 A. Right, right.

6 Q. -- having been returned from the trainer,
7 Brett Lawson, not long before the incident in
8 February 2nd.

9 A. That was my understanding too.

10 Q. Okay. So that's why there might have been
11 some concern that maybe the dog trainer had something
12 to do with a dog involved?

13 A. Right.

14 Q. Okay. But that never panned out?

15 A. No.

16 Q. Okay. So of the medical professionals that
17 were hired, Dr. Pritchard was the first doctor you
18 all retained to do an evaluation of Ms. Gloria
19 Satterfield?

20 A. Yes, sir.

21 Q. And it was a comprehensive pre-fall and
22 post-fall evaluation?

23 A. Well, it was a neurological -- I mean, she
24 had a head injury, and so we wanted him to evaluate
25 mainly what was her injury and did this injury kill

1 for identification.)

2 - - -

3 BY MR. PENDARVIS:

4 Q. Okay. All right. I'm passing to you now a
5 document marked as Exhibit 7. This is
6 Nautilus_000296_001 through 002.

7 And after you --

8 MR. LONG: Can I see that? And this is
9 7?

10 MR. PENDARVIS: Yeah. I skipped over
11 one, my apologies.

12 MR. LONG: Yeah. Okay.

13 MR. PENDARVIS: Sorry about that, Jim.
14 I'll do my best if I'm skipping to --

15 THE WITNESS: Skip them all.

16 BY MR. PENDARVIS:

17 Q. Skip them all?

18 And I -- and, John, this is --

19 A. Yeah.

20 Q. This is your letter --

21 A. Sure.

22 Q. -- to Ms. Miller?

23 A. Right.

24 Q. And just to speed things along, the very
25 bottom paragraph on page 1 summarizes Dr. Pritchard's

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1 expected testimony?
2 A. Right.
3 - - -
4 (Letter Dated 1/9/2019 marked Exhibit Number 8
5 for identification.)
6 - - -
7 BY MR. PENDARVIS:
8 Q. Okay. John, I'm passing to you now the --
9 an exhibit. You know what? I just marked my copy.
10 An exhibit that's marked as Nautilus_000325_001
11 continuing through 002.
12 A. Okay.
13 Q. This is a letter from -- is this a copy of a
14 letter from you to Cory Fleming?
15 A. That's correct.
16 Q. And it's basically -- the opening starts off
17 with, you know, "Let's get started with."
18 Had you all discussed mediation before you
19 sent this letter?
20 A. That was the -- yeah. I mean, that was on
21 the table before I -- I mean, that was on the table
22 before I was asked to get involved, and when I got
23 involved, my job was to get the case prepared for
24 mediation, get it evaluated -- get the damages
25 aspects evaluated as best I can.

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1 Q. Okay. I did want to ask you about this.
2 I'm marking -- I'm passing to you now -- this is a
3 email thread marked as Exhibit 9. This is a
4 Nautilus_000327 through 329.
5 A. Okay.
6 Q. And questions I've got for you are about
7 the --
8 A. Uh-huh.
9 Q. -- last statement at the top on page 1 of
10 Exhibit 9. It's describing phone calls with
11 "Murdaugh," and I'm assuming that's Alex.
12 A. Right.
13 Q. And the "Satterfield attorney," which I'm
14 assuming that's Cory Fleming.
15 A. That's correct.
16 Q. Was that one phone call with both of them on
17 the phone?
18 A. Yes.
19 Q. Okay. How -- tell me about that call.
20 A. It was all -- I don't remember every detail,
21 but the gist of it is, "We need to hurry up and get
22 this case mediated." And, you know, Alex was anxious
23 about getting it -- getting it mediated. You know,
24 he didn't have coverage or -- and, you know, there
25 was -- you know, he was concerned that we were

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1 And so -- so, yeah, I mean, we -- we were --
2 I mean, I reached out to Cory. I said, "Before we go
3 to mediation, we got a whole lot of stuff we don't
4 have that we need to have, and we're not in suit. We
5 can't subpoena anything. You're going to have to
6 give us this. If you want us to come to mediation,
7 you've got to give us all these things, all these --
8 medical stuff that -- records that we needed."
9 Q. And you all agreed pretty quickly on Jon
10 Austen?
11 A. Yes.
12 Q. I saw some exchange about that, but --
13 A. Uh-huh.
14 Q. -- ultimately Jon Austen was decided --
15 A. Right.
16 Q. -- as the mediator?
17 A. Ms. Miller knew him; I knew him; Cory knew
18 him.
19 Q. Everybody knows him.
20 A. Right.
21 - - -
22 (Email Chain marked Exhibit Number 9 for
23 identification.)
24 - - -
25 BY MR. PENDARVIS:

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1 dragging our feet.
2 And -- and I was trying to explain to him
3 that we -- we have stuff we got to -- "You got to let
4 me do my job. We have -- we have records we need to
5 receive and review and evaluate before we can just
6 rush into mediation. So you got..."
7 So it was -- it was basically, "What --
8 why -- why haven't we mediated yet?"
9 And I was just, "Listen, we got -- we
10 have -- you know, we -- we need records on
11 Ms. Satterfield that we don't have to evaluate, and
12 if you want us to mediate, you got to let us do our
13 job."
14 Q. Okay. And --
15 A. I mean, that's kind of the gist of it. I
16 mean, I don't remember every detail.
17 Q. Who initiated the call?
18 A. I mean, I got -- I think, as I recall, it
19 was a call from Alex with Cory on the line or Cory
20 with Alex on the line.
21 Q. Was it --
22 A. Highly unusual.
23 Q. -- a call -- well, was it a call to you and
24 "Let me get Cory on the phone" --
25 A. No. Huh-uh.

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<p style="text-align: right;">Page 46</p> <p>1 Q. -- or "Let me get Alex on the phone"?</p> <p>2 A. No.</p> <p>3 Q. Because they were already both on the phone?</p> <p>4 A. Right.</p> <p>5 Q. Do you know if they were in the same room?</p> <p>6 A. I don't know. I don't remember that. I just remember they were both on there. And Alex did most of the talking. It was about, "Hurry up and get this thing mediated."</p> <p>10 Q. You were -- what did Cory say during that call?</p> <p>12 A. I don't remember.</p> <p>13 Q. Anything other than, "Let's mediate"?</p> <p>14 A. No. I mean, Cory was not -- it was -- Cory was going to give me everything I asked him for. I mean, it was never "I'm not going to give you that." It was, you know, -- because, again, we're not -- we're pre-suit. We're not -- we can't subpoena anything, so, you know, I'm asking -- I'm asking Cory to do some work to get -- to get records and -- from different providers.</p> <p>22 And I'm not sure if he had them all already or if he had to send -- send authorizations out and it took a while, but -- but, you know, that -- that was -- that was the gist of it. You know, Alex</p>	<p style="text-align: right;">Page 48</p> <p>1 A. Right. Yeah. I don't know.</p> <p>2 Q. And this is -- the second page discusses a -- has references to a call -- or the email is dated January 9, 2019, at 3:30 p.m., and it says, "I spoke to Attorney Fleming this afternoon."</p> <p>6 A. Right.</p> <p>7 Q. "Attached is the letter."</p> <p>8 That's the cover letter asking for the documents?</p> <p>10 A. Right.</p> <p>11 Q. And did Cory call you after receiving the letter with the list of medical records you were requesting?</p> <p>14 A. I think he did. I don't specifically remember, but we talked a lot.</p> <p>16 Q. Did you speak with his paralegal, Tanya King?</p> <p>18 A. We talked to Tanya a lot.</p> <p>19 Q. She was involved in getting the records to you all?</p> <p>21 A. Yes.</p> <p>22 Q. Okay. Were there any statements from Cory Fleming about the liability part of the evaluation that was important to Nautilus or to you?</p> <p>25 A. No. I mean, I think at some point Cory said</p>
<p style="text-align: right;">Page 47</p> <p>1 I wanted us to hurry up and thought we were dragging our feet or I was dragging my feet or Nautilus was dragging their feet.</p> <p>4 And Cory was telling him, "He's -- he's getting us the information we're requesting."</p> <p>6 Q. Was it basically just logistics, getting documents from this place delivered to you, kind of thing?</p> <p>9 A. Yeah. I mean, I don't -- I don't remember the specifics about that, but I just know that the message here was, "Hurry up. You know, we -- you know, I'm -- I don't have -- I don't -- I'm not covered right now or I have coverage problems, and -- and we need to get this thing resolved and put to bed."</p> <p>16 Q. Okay. Were there any discussions in this phone call referred to on page 1 of Exhibit 9 about Hampton County, big verdicts --</p> <p>19 A. No.</p> <p>20 Q. -- or anything like that?</p> <p>21 A. They knew I knew that.</p> <p>22 Q. Okay. Okay. Now, on the -- page 2 of this same exhibit. And the phone -- the email message we just looked at is -- and it's hard to tell. January 10th, 6:32 a.m.?</p>	<p style="text-align: right;">Page 49</p> <p>1 he wanted Alex to give a deposition under the cloak of mediation to hear Alex's side of the story and -- because he had -- I think he said he had never heard Alex's version of the story, but everyone else did, but in any event, that's, you know -- but, no.</p> <p>6 Q. Okay.</p> <p>7 A. But other than him wanting Alex to give a statement at mediation, that was the only time --</p> <p>9 Q. Okay.</p> <p>10 A. -- he had ever talked about the liability issues.</p> <p>12 MS. ALLEN: I'm sorry. Did you say that Cory said he had never hear the story?</p> <p>14 THE WITNESS: That's right.</p> <p>15 MS. ALLEN: Okay.</p> <p>16 THE WITNESS: Or he had never heard Alex's explanation of what happened.</p> <p>18 BY MR. PENDARVIS:</p> <p>19 Q. What do you know about any relationship between Cory Fleming and Alex Murdaugh?</p> <p>21 A. I mean, I knew they were friends, and I had other cases with them where one represented a driver and one represented the passenger, and I represented the at-fault driver who was sued in Hampton or Allendale by virtue of the passenger suing the</p>

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Pages 50..53

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1 driver, and then the driver cross-claiming the -- my
2 driver, so I had cases with them over the years where
3 one represented one person and one represented the
4 other.

5 Q. How would you describe their relationship?

6 A. I mean, I -- I understood that they were
7 friends, and -- but, I mean, that's -- that's just, I
8 mean -- but, I mean, you know, that's -- I -- and
9 after, I've read that they went to USC together, but
10 I just understood that they were friends and that he
11 was somebody -- and I think Alex started out at Moss
12 & Kuhn when he got out of law school.

13 Q. When did you learn that?

14 A. I mean, I think I knew just in my dealings
15 with Alex --

16 Q. Okay.

17 A. -- that he started there before he went back
18 to the Murdaugh firm.

19 - - -

20 (Nautilus Internal Notes marked Exhibit Number 10
21 for identification.)

22 - - -

23 BY MR. PENDARVIS:

24 Q. All right. Mr. Grantland, I'm passing to
25 you a document that's been marked Exhibit 10 to your

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1 Hampton County about the dogs. Do you see that?

2 A. Yes.

3 Q. Were you aware that Alex's father was
4 telling people around that the dogs had caused the
5 fall?

6 A. I mean, I -- I don't specifically have a
7 memory of what Alex said about Mr. Murdaugh, but
8 that's consistent with my -- my conversations with
9 Alex. I mean, he was -- he was very -- he felt -- he
10 was very -- he felt very bad for the Satterfield
11 sons. He felt -- you know, he wanted them to be
12 compensated. He wanted us to hurry up and get it
13 resolved, and he did not want a lawsuit, and it was
14 just like, you know, that was his biggest concern.

15 Q. Were there concerns that, if a lawsuit was
16 filed, it would affect Mr. Murdaugh's law practice --

17 A. Absolutely.

18 Q. -- and his business?

19 A. Absolutely. He would look like a hypocrite
20 if his housekeeper's children had to sue him when the
21 housekeeper fell on property that -- or was -- fell
22 because of a dog. Strict liability is a statute, and
23 there's no comparative negligence. He was concerned
24 about it affecting him personally and affecting
25 his -- his firm. Absolutely.

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1 deposition. It bears Bates numbers Nautilus_002453
2 through 2454, and this appears to be Nautilus
3 internal notes. Did you have copies of these
4 materials?

5 A. No. I mean, the first time I saw this was
6 when you produced it to Jimmy.

7 Q. This would have been information that you
8 understand Amy Miller would have been putting into
9 their system?

10 A. Yes, sir.

11 Q. So what Ms. Miller put in here are things
12 she learned through you and other materials that you
13 were provided or that may have been provided before
14 you got involved.

15 A. Right, right. Exactly.

16 Q. Were -- did -- around -- and the note that
17 we're looking at on page 1 of Exhibit 10 refers to
18 January 10, 2019, 9:10 a.m. You see that?

19 A. Yes.

20 Q. Around that time, were you having
21 conversations with her? This portion of this is --
22 this is a longer note. This is just a portion of it.

23 A. Right.

24 Q. But this portion is talking about the dogs
25 and the -- whatever was being discussed around

Page 53
1 Q. Okay. And -- and this conversation or this
2 discussion Ms. Miller's recording into the Nautilus
3 file material -- file system is concerned about the
4 issue with the dogs.

5 A. Right. And she's obviously typing in what
6 I'm saying to her.

7 Q. And I presume this part at the -- let's see.
8 One, two -- it's about halfway down. It says,
9 "Defense counsel." And I'm assuming that's referring
10 to you?

11 A. Yeah. I told them to shut up. I told them
12 shut up. "Quit talking about it." You know, I did.
13 "You got to shut up. You got to let me do my job.
14 You're shooting yourself in the foot."

15 Q. Did Mr. Alex Murdaugh follow your directions
16 after you made that warning to him?

17 A. I don't think so. I don't know, I mean...
18 MR. PENDARVIS: Jimmy, I'm skipping over
19 the next document.

20 BY MR. PENDARVIS:

21 Q. There were some documents. I'm just going
22 to skip over some of these.

23 A. Uh-huh.

24 Q. I've got a couple of documents where it's
25 saying the same thing you just said, that --

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Pages 54..57

<p style="text-align: right;">Page 54</p> <p>1 A. Sure.</p> <p>2 Q. -- you were telling Ms. Miller that he --</p> <p>3 you know, "He's telling me now that even if a suit is</p> <p>4 filed, it will hurt his business and all that."</p> <p>5 Okay. I'm not going to put that into the record.</p> <p>6 I'll tell you what. Hang on. Let's move</p> <p>7 things on. There are some things that are farther</p> <p>8 into this lengthy exhibit.</p> <p>9 - - -</p> <p>10 (Email Chain marked Exhibit Number 11 for</p> <p>11 identification.)</p> <p>12 - - -</p> <p>13 BY MR. PENDARVIS:</p> <p>14 Q. I'm passing to you now a document that's</p> <p>15 marked as Exhibit 11. It's an email thread. It</p> <p>16 begins Bates number Nautilus_000410 continuing</p> <p>17 through 419. Further into the email on, I think, the</p> <p>18 third page is a list of medications. Do you see</p> <p>19 that?</p> <p>20 A. Yes.</p> <p>21 Q. And are these the medications that</p> <p>22 Dr. Westerkam was evaluating in terms of how that --</p> <p>23 you know, these medications may have affected</p> <p>24 Ms. Satterfield?</p> <p>25 A. Right. We may have sent them to both</p>	<p style="text-align: right;">Page 56</p> <p>1 (Email Chain marked Exhibit Number 12 for</p> <p>2 identification.)</p> <p>3 - - -</p> <p>4 BY MR. PENDARVIS:</p> <p>5 Q. I'm going to pass to you now a document</p> <p>6 marked -- another series of email threads. This one</p> <p>7 is marked as Exhibit 12. Nautilus_000474 through</p> <p>8 481. If you can identify that. Is that --</p> <p>9 A. Yes.</p> <p>10 Q. -- an email thread that you were --</p> <p>11 A. Yes.</p> <p>12 Q. -- involved in?</p> <p>13 A. Yes. I think this is when we were looking</p> <p>14 for someone like Dr. Westerkam to give us evaluation</p> <p>15 on cause of death, maybe life expectancy, although he</p> <p>16 wasn't able to do that.</p> <p>17 Q. So on the first page of Exhibit 12 -- okay.</p> <p>18 Let's start from the back. Page 3 references an --</p> <p>19 this is from Ms. Miller to you indicating a desire to</p> <p>20 get Dr. Pritchard to evaluate life expectancy issues?</p> <p>21 A. Right. And he couldn't do that.</p> <p>22 Q. Okay. Page 2 of Exhibit 12 is a February</p> <p>23 23, 2019, email from you to Ms. Miller. Third full</p> <p>24 paragraph talks about a conversation with</p> <p>25 Mr. Fleming. Do you see that?</p>
<p style="text-align: right;">Page 55</p> <p>1 Dr. Westerkam and Dr. Pritchard.</p> <p>2 Q. And toward the back of the -- of this</p> <p>3 exhibit and of this thread of emails, there's</p> <p>4 communications from Tanya King and Mr. Fleming</p> <p>5 providing records attached to the emails.</p> <p>6 A. Yes.</p> <p>7 Q. Is that -- so you were -- through January</p> <p>8 and February of 2019, you were getting --</p> <p>9 periodically getting copies of Ms. Satterfield's</p> <p>10 record -- medical records?</p> <p>11 A. Yes. Yes, sir.</p> <p>12 Q. Were there any medical records that were</p> <p>13 missing when you all -- before you went into the</p> <p>14 mediation?</p> <p>15 A. I don't think so. But I know we had enough,</p> <p>16 if we -- if there was something here or there, but we</p> <p>17 certainly had enough information to go to mediation.</p> <p>18 Q. Okay.</p> <p>19 A. It -- whatever -- if anything was missing,</p> <p>20 it wasn't worth stopping. I mean, it's pre-suit, so</p> <p>21 you're not going to -- we know we're not going to get</p> <p>22 everything.</p> <p>23 Q. Right.</p> <p>24 A. But we had enough to evaluate it.</p> <p>25 - - -</p>	<p style="text-align: right;">Page 57</p> <p>1 A. Yes.</p> <p>2 Q. Take a look at that for a minute. Tell me,</p> <p>3 John, what you meant about, "I smell a trap."</p> <p>4 A. Just I -- that, you know, there -- Alex</p> <p>5 and -- Alex is telling Cory things or Cory is telling</p> <p>6 Alex things. I mean, they're work -- that this is --</p> <p>7 this doesn't -- if Alex speaks at the mediation and</p> <p>8 says everything he wants to say, that doesn't help</p> <p>9 our case. It doesn't -- it makes our case worse.</p> <p>10 Q. Okay. Did --</p> <p>11 A. And that -- and that, you know, they were</p> <p>12 talking to each other. I mean, Alex knew when I</p> <p>13 received records from Tanya. Alex was aware. And,</p> <p>14 you know, "Hurry up. Why haven't you reviewed -- you</p> <p>15 know, what else do you need?"</p> <p>16 Q. Okay. Did Alex Murdaugh tell you he had</p> <p>17 spoken with Cory Fleming?</p> <p>18 A. No.</p> <p>19 Q. Did Cory Fleming tell you he'd spoken to</p> <p>20 Alex Murdaugh?</p> <p>21 A. No. But, I mean, it just was apparent.</p> <p>22 Q. And did Alex tell you -- did Alex tell you</p> <p>23 that he wanted to speak at the mediation?</p> <p>24 A. No. I told Alex, "Cory wants you to give a</p> <p>25 deposition or speak at mediation. I thinks it's a</p>

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Pages 58..61

<p style="text-align: right;">Page 58</p> <p>1 terrible idea, and I don't want you to do that."</p> <p>2 And he said, "I don't want to do that."</p> <p>3 Q. Did -- I've not seen any written record of</p> <p>4 this, but did Cory Fleming ask for a statement</p> <p>5 from --</p> <p>6 A. No.</p> <p>7 Q. -- Alex Murdaugh?</p> <p>8 A. No.</p> <p>9 Q. On page 1 of Exhibit 12, Ms. Miller -- the</p> <p>10 very bottom of this email thread of page 1,</p> <p>11 Ms. Miller is sending an email to you mentioning that</p> <p>12 she did speak with Alex Murdaugh on March 22, 2018,</p> <p>13 when the claim was reported.</p> <p>14 A. Yeah.</p> <p>15 Q. Do you see that?</p> <p>16 A. Yeah. Alex wanted to speak to her and was</p> <p>17 upset that he had not spoken to her, and I reported</p> <p>18 to her that the insured's mad that he hasn't -- "He</p> <p>19 doesn't know your name. He doesn't -- you've never</p> <p>20 talked to him."</p> <p>21 And she said, "No, I've" -- I think she</p> <p>22 said, "I talked to him early on."</p> <p>23 Q. Did Ms. Miller tell you anything about her</p> <p>24 conversation with Alex Murdaugh on March 22, 2018?</p> <p>25 A. Not specifically.</p>	<p style="text-align: right;">Page 60</p> <p>1 the underlying matter, anything with John</p> <p>2 Grantland. For the record, I just wanted to</p> <p>3 clarify that the waiver of privilege does not</p> <p>4 apply to Nautilus and us as counsel with regard</p> <p>5 to this action. We're just talking about the</p> <p>6 underlying matters.</p> <p>7 MR. LONG: Yeah, I agree with that, and</p> <p>8 I understand what you're saying.</p> <p>9 MR. MAGILL: Thank you.</p> <p>10 MR. PENDARVIS: Okay. Got that cleared</p> <p>11 up? Excellent.</p> <p>12 - - -</p> <p>13 (Email Chain marked Exhibit Number 13 for</p> <p>14 identification.)</p> <p>15 - - -</p> <p>16 BY MR. PENDARVIS:</p> <p>17 Q. Mr. Grantland, moving back into the record.</p> <p>18 And I'm really, as we're going through these, trying</p> <p>19 to establish the record on the claim evaluation that</p> <p>20 was done prior to mediation. In that regard, I'm</p> <p>21 passing to you a document marked as Exhibit 13 to</p> <p>22 your deposition, Nautilus_000465 through 473.</p> <p>23 MS. ALLEN: What's the date on the</p> <p>24 front?</p> <p>25 MR. PENDARVIS: The initial date is</p>
<p style="text-align: right;">Page 59</p> <p>1 Q. Generally?</p> <p>2 A. I don't remember -- I don't remember her</p> <p>3 telling me -- other than that -- it's my</p> <p>4 understanding that they talked when the claim was</p> <p>5 first reported, or when the claim was assigned to</p> <p>6 her, she talked to him, but they only talked once,</p> <p>7 and that's really all I know.</p> <p>8 Q. Shortly after this -- these emails, this</p> <p>9 email thread on February 25, 2019, had everyone on</p> <p>10 Nautilus's side of the dispute decided Alex was not</p> <p>11 going to speak at the mediation?</p> <p>12 A. I mean, he said he didn't want to, and we</p> <p>13 certainly didn't want him to.</p> <p>14 Q. Okay. I'll hold -- we're going to get to</p> <p>15 the mediation later.</p> <p>16 A. Yeah. Yeah.</p> <p>17 (The stenographer requests a break.)</p> <p>18 MR. PENDARVIS: Yeah, sure.</p> <p>19 Break time, everyone.</p> <p>20 - - -</p> <p>21 (There was a recess from 11:02 to 11:18.)</p> <p>22 - - -</p> <p>23 MR. MAGILL: Jimmy, this is Clinton</p> <p>24 Magill from Nautilus. We had an exchange earlier</p> <p>25 to confirm the waiver of privilege with regard to</p>	<p style="text-align: right;">Page 61</p> <p>1 February 25, 2019, at 13 -- excuse me --</p> <p>2 3:15 p.m., and that is the first date that</p> <p>3 appears on page 1 of Exhibit 13.</p> <p>4 THE WITNESS: Okay.</p> <p>5 BY MR. PENDARVIS:</p> <p>6 Q. And, candidly, this could have been one of</p> <p>7 the earlier exhibits.</p> <p>8 A. No, no.</p> <p>9 Q. The first page is the only really new piece</p> <p>10 of information.</p> <p>11 A. Yeah.</p> <p>12 MR. PENDARVIS: My apologies, everyone.</p> <p>13 BY MR. PENDARVIS:</p> <p>14 Q. And I do want to ask you about, though, the</p> <p>15 email midway through page 1 of Exhibit 13 from</p> <p>16 Ms. Miller to you. And so the -- there were</p> <p>17 independent adjusters sent to the first responders to</p> <p>18 understand what they heard and saw when they came to</p> <p>19 see Ms. Satterfield on February 2nd --</p> <p>20 A. That's my understanding.</p> <p>21 Q. -- 2018?</p> <p>22 A. Yes.</p> <p>23 Q. Okay. Do you recall any -- the substance of</p> <p>24 any report that you might have gotten from those?</p> <p>25 A. Just that -- whoever spoke to the first</p>

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Pages 62..65

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1 responders. The first responders said they were not
2 aware of any dogs being around --
3 Q. Okay.
4 A. -- or something to that effect.
5 Q. And no one discussing dogs --
6 A. Right.
7 Q. -- at the scene? Okay.
8 A. It was all about taking care of Ms. --
9 Ms. Satterfield.
10 MR. PENDARVIS: Okay. Jimmy, I'm
11 skipping over the next one too.
12 MR. LONG: Okay.
13 - - -
14 (Emails Dated 3/6/2019 marked Exhibit Number 14
15 for identification.)
16 - - -
17 BY MR. PENDARVIS:
18 Q. And, again, Mr. Grantland, just more for
19 the -- the record on the claim evaluation process --
20 A. Sure.
21 Q. -- your investigation process. I'm passing
22 to you now another email thread. This one's marked
23 Exhibit 14 to your deposition, Nautilus_000533
24 through 535. You see that?
25 A. Yes.

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1 MR. PENDARVIS: Okay. Jimmy, I'm
2 skipping the next one too. A good bit of
3 testimony on that.
4 - - -
5 (Emails Dated 3/6/2019 marked Exhibit Number 15
6 for identification.)
7 - - -
8 BY MR. PENDARVIS:
9 Q. John, I'm passing you another document.
10 This is an email thread marked as Exhibit 15 to your
11 deposition. It contains Bates number Nautilus_000526
12 through 000529. You see that?
13 A. Yes.
14 Q. And this is an email thread between you and
15 Ms. Miller?
16 A. Yes.
17 Q. Had you -- the two of you had a
18 conversation? Her email to you that is dated March
19 6, 2019, 9:24, sets forth four different categories
20 of positions, I'll call it, that -- that she thought
21 was important for the mediation session. Is that
22 correct?
23 A. Yes, sir.
24 Q. Had you all discussed these items before?
25 A. Absolutely.

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1 Q. And the list of conditions that are --
2 appear on page one of Exhibit 14, was that a list
3 that Ms. Miller developed?
4 A. I don't know. I'm not sure if it came from
5 our medical summary that we did based on the records
6 or from Ms. Miller. I'm not -- it -- I mean she
7 received the -- the substance from the medical
8 records --
9 Q. Right.
10 A. -- and so I'm assuming this is her question
11 to me to ask Dr. Westerkam.
12 Q. And so if I'm understanding correctly,
13 Dr. Pritchard was -- had been engaged, and then the
14 decision was made to get an internist, and
15 Dr. Westerkam was the candidate to go do this
16 second --
17 A. Right.
18 Q. -- life expectancy evaluation.
19 A. And he really didn't -- no one wanted to do
20 a life expectancy. And that -- or -- neither
21 Dr. Westerkam or Dr. Pritchard really -- they thought
22 that was kind of speculative, but Westerkam could at
23 least say all the -- all the other health issues
24 Ms. Satterfield had going on that -- and what was --
25 what caused her to pass away.

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1 Q. Okay. Was there anything new to this
2 conversation that you all hadn't already --
3 A. No.
4 Q. -- developed?
5 A. I mean, no. Other than just -- you know, we
6 can't make the doctors tell us -- you know, we can
7 only ask the doctors these questions. They may or
8 may not be able to give us an opinion, but these --
9 these are the issues that we wanted to address with
10 Dr. Westerkam.
11 Q. Okay. Thank you.
12 A. Uh-huh.
13 - - -
14 (Email Dated 3/8/2019 marked Exhibit Number 16
15 for identification.)
16 - - -
17 BY MR. PENDARVIS:
18 Q. I'm going to pass to you now a single-page
19 email marked as Exhibit 16. This is Nautilus_000554.
20 And this is from Ms. Miller to you dated March 8,
21 2019, correct?
22 A. Yes.
23 Q. And this email -- in this email, Ms. Miller
24 is communicating to you about a boat collision
25 involving Paul Murdaugh. It doesn't say Paul, but

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<p style="text-align: right;">Page 66</p> <p>1 it's "Mr. Murdaugh's son." Did you recall receiving 2 this?</p> <p>3 A. Yes.</p> <p>4 Q. Before you received this March 8, 2019, 5 email, had you heard about the boat crash?</p> <p>6 A. At some point. I mean, I -- like everybody. 7 If it was -- I'm not sure whether she told me -- 8 whether I read it in the paper that day or heard 9 about it that day, but it's certainly around the same 10 time.</p> <p>11 Q. I think the crash was on February 24, 2019. 12 A. Okay. Well, then I would have known before 13 she did.</p> <p>14 Q. Okay.</p> <p>15 A. I mean, I would have read the news like 16 anybody else.</p> <p>17 Q. Did you have any conversations with Alex 18 Murdaugh about this event?</p> <p>19 A. Just -- just that he was upset about it.</p> <p>20 Q. Okay. Did you all have any -- did you have 21 any conversations with Alex Murdaugh on how this boat 22 crash event might play into the mediation with the 23 Satterfield claim?</p> <p>24 A. I mean, he wanted -- he wanted this case, 25 the Satterfield case, resolved because he -- you</p>	<p style="text-align: right;">Page 68</p> <p>1 Q. Okay. Okay. 2 - - - 3 (Letter Dated 3/11/2019 marked Exhibit Number 17 4 for identification.) 5 - - -</p> <p>6 BY MR. PENDARVIS:</p> <p>7 Q. Mr. Grantland, I'm passing to you now a 8 copy -- I believe it's a letter from you to 9 Ms. Miller dated March 11, 2019. This is Bates 10 number Nautilus_000508_001 through 002.</p> <p>11 Is this a copy of a letter that you sent to 12 Ms. Miller?</p> <p>13 A. Yes.</p> <p>14 Q. And this is -- can I accurately summarize 15 this as a summary of Dr. Westerkam's opinions -- 16 A. Yes.</p> <p>17 Q. -- after reviewing the records and, you 18 know, offering his opinion?</p> <p>19 A. Yes.</p> <p>20 Q. And if I'm understanding Dr. Westerkam's 21 summary as you state to Ms. Miller, he believed this 22 was, like, a multi-factor event, that the fall was 23 just one of other factors that led to 24 Ms. Satterfield's death?</p> <p>25 A. That's correct, I mean. And I think, again,</p>
<p style="text-align: right;">Page 67</p> <p>1 know, this -- he was dealing with this, and I'm not 2 sure the specifics of his insurance, but he was 3 concerned about insurance coverage.</p> <p>4 Q. For Paul --</p> <p>5 A. Right.</p> <p>6 Q. -- or whatever exposure Paul may have --</p> <p>7 A. Right.</p> <p>8 Q. -- had from this.</p> <p>9 A. Or for -- you know, just for him and for 10 Paul.</p> <p>11 Q. Did you speak with Alex after receiving this 12 email about the boat event?</p> <p>13 A. I don't know if I did or not.</p> <p>14 Q. How about Ms. Miller, after you received 15 this email, did you have any conversations with her 16 about how this boat event may impact mediation?</p> <p>17 A. I don't -- I'm -- we had a lot of 18 conversations. Whether I specifically had one with 19 her about the boat -- how the boat crash would affect 20 mediation, I can't -- I can't say, but I know it came 21 up in other conversations. I mean, it was all part 22 of Alex's overall just -- he -- "This needs to be put 23 to bed." It's --</p> <p>24 Q. Another reason to --</p> <p>25 A. Yeah.</p>	<p style="text-align: right;">Page 69</p> <p>1 she had recovered from the head injury from the fall, 2 but -- but then she took a turn in the hospital and 3 got worse and never recovered.</p> <p>4 Q. Did you have any discussions with Ms. Miller 5 about the plaintiff in this case would -- would not 6 have to prove that it was the sole cause; it was just 7 a cause?</p> <p>8 A. Yeah. This was not -- I mean, he couldn't 9 give us a clean break between the fall and her death. 10 You know, the fall, serious injuries from the fall, 11 broken injuries from the fall, and then it led to -- 12 and then she went downhill from that.</p> <p>13 Q. Okay.</p> <p>14 A. So he couldn't just -- he could not say with 15 medical certainty that she died from this -- this -- 16 this medical event and it had nothing to do with her 17 fall.</p> <p>18 Q. Okay. And that would increase the risk 19 of --</p> <p>20 A. Absolutely.</p> <p>21 Q. -- plaintiff being able to establish 22 causation and --</p> <p>23 A. Right.</p> <p>24 Q. Okay. All right.</p> <p>25 MR. PENDARVIS: Off the record just for</p>

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<p>1 a minute. No. It's right here. Back on the 2 record. I'm sorry. The document I was looking 3 for was right here, kind of like the exhibit 4 stickers.</p> <p>5 Sorry about that. 6 - - - 7 (Letter Dated 3/14/2019 marked Exhibit Number 18 8 for identification.) 9 - - -</p> <p>10 BY MR. PENDARVIS:</p> <p>11 Q. Mr. Grantland, I'm passing to you now a copy 12 of a document marked as Exhibit 18. It appears to be 13 a copy of a mediation letter you wrote to Mr. Jon 14 Austen on this matter.</p> <p>15 A. Yes.</p> <p>16 Q. Is that correct?</p> <p>17 A. Yes.</p> <p>18 Q. And prior to sending Mr. Austen this letter 19 dated March 14, 2019, did you discuss the claim with 20 Mr. Austen?</p> <p>21 A. I'm sure I did. I don't remember the 22 specifics, but he either called me or I called him.</p> <p>23 Q. Fairly typical, right?</p> <p>24 A. Right.</p> <p>25 Q. You have a conversation about the claim</p>	<p>Page 70</p> <p>1 A. Right.</p> <p>2 Q. In the initial conversations you had with 3 Jon Austen about the claim that was going -- he was 4 going to mediate, did you have any discussion about 5 the dog or the claim about the dogs having --</p> <p>6 A. Yeah.</p> <p>7 Q. -- caused the fall?</p> <p>8 A. I mean, we -- it was very clear that the 9 only evidence of a dog was Alex. And -- and, you 10 know, if -- you know, we -- we're not -- if -- the 11 only evidence of a dog was Alex, and this was one of 12 those cases where, if a suit was filed, it was going 13 to hurt Alex more than just the law -- than the 14 actual -- the law -- the results of the lawsuit. 15 Just the fact that the suit was -- we're really 16 trying to keep suit from being filed because that 17 would affect him. It would affect his firm, and that 18 was very -- made very clear to me, so we were trying 19 to -- so he was the only evidence of liability, but 20 he was also pressured to get this case resolved.</p> <p>21 Q. Were you aware of Cory Fleming having any 22 involvement until he appeared as the lawyer? I mean 23 any involvement in Ms. Satterfield's death.</p> <p>24 A. No. I mean, I don't know when he got 25 involved, and I just know that when I got the case</p>
<p>1 and defenses and --</p> <p>2 A. Right. And it's unusual because Alex was 3 the defendant.</p> <p>4 Q. Okay. Did you have any conversations -- or 5 as part of your conversation with Jon Austen, did any 6 of that include discussions about Cory Fleming?</p> <p>7 A. No. I mean, just other -- other than -- I 8 mean, no. I mean, Cory's the lawyer for the estate, 9 and I think Jon knew that Alex referred the 10 Satterfields to Cory.</p> <p>11 Q. Huh. How did he know that?</p> <p>12 A. I mean, I just -- Alex told us.</p> <p>13 Q. Okay. Did -- in your conversation with Jon 14 Austen, was Alex Murdaugh on the phone or --</p> <p>15 A. No.</p> <p>16 Q. -- part of that?</p> <p>17 A. No.</p> <p>18 Q. Okay.</p> <p>19 A. I mean, this may have been at the 20 mediation --</p> <p>21 Q. Okay.</p> <p>22 A. -- but...</p> <p>23 Q. I know it's hard to distinguish.</p> <p>24 A. Yeah.</p> <p>25 Q. It's been a while.</p>	<p>Page 71</p> <p>1 and the claim was made, Cory was the Satterfield's 2 attorney.</p> <p>3 Q. And the page 1 of Exhibit 18, the mediation 4 letter, did -- were there any conversations about 5 the -- you know, there's a reference in the 6 "Background" section. First full paragraph beneath 7 says, "On the date of the loss." You see that?</p> <p>8 A. Right. Yes.</p> <p>9 Q. It says, "Murdaugh has at least three dogs 10 that had been through obedience training who were 11 allegedly also at the house."</p> <p>12 Did you have any conversations with Jon 13 Austen about potential exposure by the dog trainer?</p> <p>14 A. No.</p> <p>15 Q. Okay. Page 2 of this same letter marked as 16 Exhibit 18 also talks about EMS workers. Did you 17 explain to -- to Jon Austen that the dogs had been 18 secured before the EMS workers --</p> <p>19 A. Yes.</p> <p>20 Q. -- got there?</p> <p>21 A. Yes.</p> <p>22 Q. Okay. And toward the bottom of the section 23 that's captioned "Why Did Plaintiff Fall," there 24 is -- the final paragraph says, "For purposes of 25 mediation." And it says, "I do not intend to argue</p>

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1 liability."

2 Did that happen at the mediation? Did you

3 argue liability issues or --

4 A. We didn't have a opening session. We just

5 went there, met everyone and went in separate rooms.

6 Q. Okay.

7 A. So this was not a -- I had a mediation

8 outline, I think, like I always do. I didn't have a

9 PowerPoint, but I had, like, an outline, and I think

10 it may have been decided -- I may have done the

11 outline. Then it was decided we're not going to do

12 openings. We're just going to just separate. So

13 before this letter was written, it had not been

14 decided that we're -- no one wants to -- Cory did not

15 want to have an opening session. He just wanted us

16 just to split up.

17 Q. We're going to get to the mediation shortly.

18 A. Okay. Yeah.

19 Q. I just -- but as far as --

20 A. But that was -- you know, you -- normally,

21 at a mediation, you -- as a defense lawyer, you argue

22 what you can argue, whether it's liability or damages

23 or both. And we just said, "We're not fighting about

24 whether a dog was involved. We're trying to get the

25 case resolved."

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1 everybody, and then you're -- you're -- we're sent

2 off to the room with a big pipe in the wall, and I --

3 but I remember you shake hands with people, and then

4 you go in separate rooms --

5 Q. Okay.

6 A. -- and that was -- that was it.

7 Q. And my understanding is this was -- this was

8 delivered about one week before the mediation?

9 A. I think so.

10 Q. March 21 was the mediation?

11 A. Yes.

12 Q. Okay. I'm going to go ahead and mark this

13 as an exhibit. It's somewhat repetitive, but...

14 - - -

15 (Westerkam Report Dated 3/11/2019 marked Exhibit

16 Number 19 for identification.)

17 - - -

18 BY MR. PENDARVIS:

19 Q. Mr. Grantland, I'm passing to you now a

20 single-page exhibit marked as Exhibit 19. This is

21 Bates labeled Nautilus_002240. This appears to be an

22 opinion from Dr. Westerkam.

23 A. Yes.

24 Q. Is that what it is?

25 A. Yes.

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1 Q. Okay. Did -- since Lloyd's or Brit,

2 whichever -- however it's referred to, since they

3 tendered their limits, they -- there was no -- Scott

4 Wallenger didn't participate in the mediation; did

5 he?

6 A. No. He was there.

7 Q. He was there?

8 A. Uh-huh.

9 Q. Who all attended the mediation?

10 A. I mean, it was -- in our room it was me and

11 a guy named Robert Kennedy of Phelps Dunbar, I

12 believe. Scott Wallenger, Amy Miller, Alex. And

13 that -- I mean, we had six of us. I mean, three

14 lawyers, Amy and -- five of us. Three lawyers and

15 Amy and Alex in one room, and Cory was in a room.

16 And I believe the -- the banker was in a room by

17 himself.

18 Q. Mr. Westendorf?

19 A. Uh-huh.

20 Q. He was -- was he on the --

21 A. I believe.

22 Q. On the phone or in a separate room?

23 A. I remember seeing him in a room.

24 Q. Okay.

25 A. But I -- you know, again, you meet

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1 Q. And -- and this -- you had -- you used this

2 at the mediation or discussed it?

3 A. I would have. I mean, I -- again, we -- I

4 mean, by the time we're at the mediation, it's all

5 about numbers.

6 Q. Okay.

7 A. They want the policy limits, and we're

8 trying to get the case resolved. But I certainly

9 passed this on to Ms. Miller.

10 Q. And consistent with the idea of trying to

11 get the case resolved --

12 A. Right.

13 Q. -- his opinion is describing -- is the -- I

14 think it says on the very last paragraph, "The

15 cardiac arrest was expected -- unexpected given her

16 medical status and may have indicated an underlying

17 cardiac condition that was unknown at the time.

18 Therefore, I believe the patient's death is

19 multi-factorial"?

20 A. Right.

21 Q. Which meant it may have been a cause --

22 A. But not the only cause.

23 Q. Right. Okay.

24 A. I mean, there was no definitive -- you

25 couldn't say, "Well, she fell and she was injured,

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<p>1 but she died from something else."</p> <p>2 - - -</p> <p>3 (Emails Dated 3/18/2019 marked Exhibit Number 20</p> <p>4 for identification.)</p> <p>5 - - -</p> <p>6 BY MR. PENDARVIS:</p> <p>7 Q. I'll tell you what. I'm going to ask you</p> <p>8 some -- I'm going to pass you an exhibit. I've got</p> <p>9 some questions about the topic before I get into the</p> <p>10 exhibit, but I'm passing to you now an email thread,</p> <p>11 a series of emails, marked as Exhibit 20 to your</p> <p>12 deposition, and it's Bates labeled Nautilus_000577</p> <p>13 through 579.</p> <p>14 A. Yes.</p> <p>15 Q. These are emails between you and Ms. Miller?</p> <p>16 A. Yes.</p> <p>17 Q. Before the mediation itself, this is -- the</p> <p>18 last email on this chain is March 18, 2019. Were</p> <p>19 there conversations about ultimate venue if the</p> <p>20 matter was not resolved?</p> <p>21 A. Yes.</p> <p>22 Q. Tell me about those conversations.</p> <p>23 A. I mean, you know, I assumed Alex lived in</p> <p>24 Hampton. I assumed the -- the house in Islandton was</p> <p>25 in Hampton, but apparently it was in Colleton, but</p>	<p>Page 78</p> <p>1 A. Right.</p> <p>2 Q. Okay. Now, page 1 of Exhibit 20, second</p> <p>3 full -- and toward the bottom. This is your email to</p> <p>4 Ms. Miller at 8:13 in the morning on March 18. It --</p> <p>5 you're giving some projections on what it's likely</p> <p>6 going to take to get the case settled.</p> <p>7 A. Right.</p> <p>8 Q. And it says, "Honestly, if you want to</p> <p>9 settle on Friday, I think it will take closer to 3</p> <p>10 million to 4 million."</p> <p>11 How did you come to that number -- numbers?</p> <p>12 A. Our coverage was 5 million. The meds were</p> <p>13 700,000. You know, the going settlement -- at least</p> <p>14 most cases settled down there -- the demand was ten</p> <p>15 times the meds, and sometimes you could get it down</p> <p>16 from that, but that was just spitballing.</p> <p>17 Q. Were you and Ms. Miller concerned it was</p> <p>18 going to be -- it was going to take a \$5 million</p> <p>19 policy limit to get the case resolved?</p> <p>20 A. I mean, that -- I knew that was the risk if</p> <p>21 the case went to trial. It could be in excess of 5</p> <p>22 million, and then we'd deal with -- we'd have to deal</p> <p>23 with extracontractual issues, bad faith claim by --</p> <p>24 by Alex, but, you know, they wanted to mediate. You</p> <p>25 know, if someone's insistent on mediating, that -- to</p>
<p>Page 79</p> <p>1 that was -- I assumed everything was Hampton. I</p> <p>2 assumed he had a home in Hampton and this house in</p> <p>3 Islandton was kind of just a weekend hunting lodge,</p> <p>4 but -- so we were discussing venue, and I said,</p> <p>5 "Hampton's a terrible venue."</p> <p>6 Q. I thought it was pretty interesting how you</p> <p>7 described it toward the bottom. I'm going to read</p> <p>8 it.</p> <p>9 A. Yeah.</p> <p>10 Q. "It's really like an alternative universe or</p> <p>11 the" --</p> <p>12 A. Right.</p> <p>13 Q. -- Twilight Zone down there."</p> <p>14 A. That's right.</p> <p>15 Q. And that's from the defense perspective?</p> <p>16 A. That's from my perspective, yes.</p> <p>17 Q. Now --</p> <p>18 A. And that's consistent with -- I think around</p> <p>19 this time I was sending her a PowerPoint that Mark</p> <p>20 Tinsley had shown at a mediation with just no damages</p> <p>21 and crazy verdicts.</p> <p>22 Q. I saw where Hampton County was number four</p> <p>23 in the Hellhole Jurisdiction's website in the county.</p> <p>24 A. Right.</p> <p>25 Q. At the time anyway.</p>	<p>Page 81</p> <p>1 me, that means that they're willing to take less than</p> <p>2 the limits. Otherwise, they wouldn't be insistent on</p> <p>3 mediating. So I assumed -- 3 to 4 million is a lot</p> <p>4 of money, and I assumed that we would -- it would not</p> <p>5 require the policy limits, but I didn't -- I knew it</p> <p>6 would require most of the policy.</p> <p>7 Q. Okay. Were you aware of the amount of</p> <p>8 reserves --</p> <p>9 A. No.</p> <p>10 Q. -- Nautilus had --</p> <p>11 A. I wouldn't have -- I wouldn't know anything</p> <p>12 about that.</p> <p>13 Q. Okay. They reserved something, but you</p> <p>14 just --</p> <p>15 A. Right.</p> <p>16 Q. -- didn't know what.</p> <p>17 A. They wouldn't tell me. As a defense lawyer,</p> <p>18 I wouldn't know that. And, I mean, your strategy is</p> <p>19 you go to mediation. You assume if you put good</p> <p>20 money out there, the actual parties will be motivated</p> <p>21 to want to get it resolved.</p> <p>22 Q. Okay. And page 2 of this exhibit has your</p> <p>23 reference to the PowerPoints --</p> <p>24 A. Right.</p> <p>25 Q. -- of Mr. Tinsley.</p>

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<p style="text-align: right;">Page 82</p> <p>1 Okay. Subject to the discussion earlier 2 about confidentiality issues related to the mediation 3 being reserved for later in this dispute, whether 4 they're admissible or not, I do have some questions 5 for you --</p> <p>6 A. Okay.</p> <p>7 Q. -- about the mediation.</p> <p>8 MS. ALLEN: Can we go off the record for 9 one second?</p> <p>10 MR. PENDARVIS: Certainly. 11 - - - 12 (A discussion was held off the record.) 13 - - -</p> <p>14 BY MR. PENDARVIS:</p> <p>15 Q. So, Mr. Grantland, you've already testified 16 that the parties broke into separate rooms to begin 17 the -- after, you know, meeting and greeting 18 everyone, separating, the two separate rooms, to 19 begin the actual mediation part.</p> <p>20 A. That's correct.</p> <p>21 Q. Okay. And during the mediation, was 22 Mr. Murdaugh insisting that the case get settled and 23 he was advocating --</p> <p>24 A. Yes.</p> <p>25 Q. -- accepting offers and getting it settled?</p>	<p style="text-align: right;">Page 84</p> <p>1 A. You mean settlement demands or -- 2 Q. Well, not so much the settlement demands, 3 but statements of fact or conclusions or, you know, 4 assertions about what happened or things of that 5 nature from --</p> <p>6 A. No.</p> <p>7 Q. -- Cory Fleming?</p> <p>8 A. No. I mean, he was in a separate room, and 9 we said hello, but that was -- you know, I mean, Cory 10 said some things towards the end of the mediation 11 but -- regarding settlement, but -- but not about the 12 facts.</p> <p>13 Q. But those were value issues on money, like 14 whether that's -- whether the offer/counteroffer was 15 sufficient or not, but that's the discussions you 16 were --</p> <p>17 A. Right.</p> <p>18 Q. What comments you were getting from -- 19 A. Right, right.</p> <p>20 Q. -- Cory Fleming's side was, "That's not 21 enough," or things of that nature?</p> <p>22 A. Right. I mean, ultimately it came down 23 to -- and I don't know how many back-and-forths there 24 was, but Austen gave a proposal, and sometimes 25 mediators do that, and it was 3 -- I think it was the</p>
<p style="text-align: right;">Page 83</p> <p>1 A. Yes.</p> <p>2 Q. Consistently.</p> <p>3 A. Yes.</p> <p>4 Q. Were there complications related to the 5 Lloyd's tender of their offer? Is that involved in 6 any way with the discussions?</p> <p>7 A. No. I mean, Scott was there mainly for -- 8 he had -- he did most of the investigation, and he 9 was there more to support, but, I mean, it was -- 10 their money was gone. He was just there because he 11 was involved in the initial investigation, and he 12 knew more of the facts than I did.</p> <p>13 Q. And so there were discussions about the 14 basis for the claim --</p> <p>15 A. Right.</p> <p>16 Q. -- and defenses to the claim and what 17 happened that led to the -- ultimately the --</p> <p>18 A. Right.</p> <p>19 Q. -- negotiations of a settlement. Okay.</p> <p>20 And were -- and I have one exception to what 21 Ms. Allen had expressed concerns about when we were 22 off record. I do want to find out did -- were there 23 any statements by Mr. Cory Fleming that were 24 discussed in your room in terms of positions taken on 25 behalf of the estate of Gloria Satterfield?</p>	<p style="text-align: right;">Page 85</p> <p>1 3.8 number, and it was more than we had, and it was a 2 lot less than -- I think their demand was 4.5 or 3 something like that.</p> <p>4 And -- and Cory -- I mean, that was -- 5 that's kind of where we left it, and the last thing I 6 said to -- the last thing Cory said to me was he's 7 talked to Tony, and if we can get that, we can settle 8 the case.</p> <p>9 Q. This number, the mediator's number --</p> <p>10 A. Yeah. The mediator's proposal.</p> <p>11 Q. -- Mr. Austen, ultimately became the 12 number --</p> <p>13 A. Right.</p> <p>14 Q. -- 3.8 million. Okay.</p> <p>15 A. He said he talked to -- I mean, so, you 16 know, that was the number given to us, and we're -- 17 we're -- we said, "We'll -- let's give us some time 18 to process that and get -- and roundtable it and get 19 back to you."</p> <p>20 And Cory said he talked to Tony, and if we 21 get to that number, he'll -- we can -- if we get to 22 3.8, they'll accept it.</p> <p>23 Q. And this is kind of a hallway conversation?</p> <p>24 A. Yeah. This is, like --</p> <p>25 Q. All the lawyers will come out into the hall.</p>

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<p>1 We've all done that.</p> <p>2 A. This is -- yeah. Yeah. This is the last.</p> <p>3 You know, we're leaving --</p> <p>4 Q. Okay.</p> <p>5 A. -- at that point.</p> <p>6 (Stenographer admonishes simultaneous cross-talk</p> <p>7 and requests all participants take turns</p> <p>8 speaking.)</p> <p>9 BY MR. PENDARVIS:</p> <p>10 Q. So after the mediation concluded, no</p> <p>11 declaration of impasse, right? Is that correct?</p> <p>12 A. That's right.</p> <p>13 Q. And it was a -- everyone understood there</p> <p>14 will be continuing conversations trying to resolve</p> <p>15 the case, and it was an issue more about Nautilus and</p> <p>16 authority to resolve it at 3.8?</p> <p>17 A. Right.</p> <p>18 Q. Okay. And so after the formal mediation</p> <p>19 concluded, did you have continued conversations with</p> <p>20 Ms. Miller or others inside of Nautilus about</p> <p>21 authority, or was it just Ms. Miller?</p> <p>22 A. Just Ms. Miller.</p> <p>23 Q. Okay. And at a point between the 21st of</p> <p>24 March 2019 and March 25, 2019, a decision had been</p> <p>25 made to accept the mediator offer number of 3.8?</p>	<p>Page 86</p> <p>1 MR. CLEMENT: Yeah, it was the 22nd.</p> <p>2 MR. PENDARVIS: Okay. 22nd. My</p> <p>3 apologies if I said that, and I've said that</p> <p>4 consistently throughout the day, if that's wrong.</p> <p>5 Whatever the day the mediation was --</p> <p>6 THE WITNESS: Right.</p> <p>7 MR. PENDARVIS: -- was that --</p> <p>8 THE WITNESS: Right.</p> <p>9 MR. PENDARVIS: The Friday before March</p> <p>10 25th, so that would be the 22nd. My apologies.</p> <p>11 Thank you.</p> <p>12 BY MR. PENDARVIS:</p> <p>13 Q. So by March 25, 2019 -- and let me get back</p> <p>14 to authenticate the email. Is this an email you sent</p> <p>15 to Mr. Fleming and Mr. Wallenger with copies to</p> <p>16 Mr. Murdaugh and Ms. Miller and Jon Austen on the</p> <p>17 25th confirming terms of settlement?</p> <p>18 A. Yes.</p> <p>19 Q. Okay. And over the weekend, I presume you</p> <p>20 and others at -- and Scott Wallenger had been working</p> <p>21 on the settlement agreement?</p> <p>22 A. It may have been worked on before --</p> <p>23 Q. Okay.</p> <p>24 A. Before then. I'm not sure.</p> <p>25 Q. Okay. I'm just looking at it.</p>
<p>1 A. That's correct.</p> <p>2 - - -</p> <p>3 (Email Dated 3/25/2019 marked Exhibit Number 21</p> <p>4 for identification.)</p> <p>5 - - -</p> <p>6 BY MR. PENDARVIS:</p> <p>7 Q. Okay. I'm going to pass to you now a</p> <p>8 document marked as Exhibit 21 which is Bates</p> <p>9 labeled -- it's a single-page email Bates labeled</p> <p>10 Nautilus_000593. Is this a copy of a email from you</p> <p>11 to --</p> <p>12 MR. CLEMENT: Tommy, I'm sorry to</p> <p>13 interrupt you, but I think you might have</p> <p>14 misstated the date of mediation in the last</p> <p>15 question.</p> <p>16 MR. PENDARVIS: I'm sorry. Mediation</p> <p>17 was March 21, 2019?</p> <p>18 MR. CLEMENT: Was it the 21st or the</p> <p>19 22nd?</p> <p>20 MR. PENDARVIS: I think it was the 21st.</p> <p>21 It was a Friday.</p> <p>22 MR. CLEMENT: Okay.</p> <p>23 MR. LONG: It was the 22nd.</p> <p>24 MR. PENDARVIS: The Friday</p> <p>25 before March --</p>	<p>Page 87</p> <p>1 A. Uh-huh.</p> <p>2 Q. And it says, "Attachment: Settlement</p> <p>3 Agreement."</p> <p>4 A. Right.</p> <p>5 Q. "Updated" -- I think you're correct on that.</p> <p>6 "Updated 3/25/19"?</p> <p>7 A. Right. Yeah.</p> <p>8 Q. Okay. And this is more of a curiosity</p> <p>9 question, this next email.</p> <p>10 - - -</p> <p>11 (Email Dated 3/25/2019 marked Exhibit Number 22</p> <p>12 for identification.)</p> <p>13 - - -</p> <p>14 BY MR. PENDARVIS:</p> <p>15 Q. Mr. Grantland, I'm passing to you now a</p> <p>16 document marked as Exhibit 22 to your deposition, and</p> <p>17 it's dated March 25 at 6:27 a.m. Do you think those</p> <p>18 are correct times?</p> <p>19 A. No.</p> <p>20 Q. Okay.</p> <p>21 A. No.</p> <p>22 Q. Something was --</p> <p>23 A. Yeah.</p> <p>24 Q. Okay. I was going to say. You guys are up</p> <p>25 at 5:00 in the morning?</p>

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<p style="text-align: right;">Page 90</p> <p>1 A. Not -- not working.</p> <p>2 Q. Okay. But this --</p> <p>3 MR. LONG: I've been wondering if --</p> <p>4 I've wondered if that's Pacific time.</p> <p>5 MR. PENDARVIS: Okay.</p> <p>6 THE WITNESS: Yeah.</p> <p>7 MR. PENDARVIS: Could be.</p> <p>8 MR. LONG: Because she's in -- she's in</p> <p>9 Arizona. It could be Mountain.</p> <p>10 MR. PENDARVIS: I feel better for</p> <p>11 everybody. Okay. The -- well, even though she</p> <p>12 would be up pretty early doing that, but --</p> <p>13 MR. LONG: The recording it on her time.</p> <p>14 In other words, when he sends the email to her --</p> <p>15 MR. PENDARVIS: It's --</p> <p>16 MR. LONG: -- it's 5:43 --</p> <p>17 MR. PENDARVIS: Okay.</p> <p>18 MR. LONG: -- in the morning in Arizona.</p> <p>19 That's a possibility.</p> <p>20 MR. PENDARVIS: All right.</p> <p>21 MR. LONG: I wondered that myself,</p> <p>22 but...</p> <p>23 BY MR. PENDARVIS:</p> <p>24 Q. So the curiosity question on Exhibit 22 was</p> <p>25 more along the lines of was there some concern that</p>	<p style="text-align: right;">Page 92</p> <p>1 A. He -- he -- it was -- he said that the --</p> <p>2 and I had this -- there was an email. He said that</p> <p>3 the PR would act as a conservator and -- I mean,</p> <p>4 because we were -- I -- we were concerned about the</p> <p>5 Satterfield child with special needs or man with</p> <p>6 special needs, and he -- and I specifically asked</p> <p>7 them about a conservator, and he said that the PR</p> <p>8 would act as a conservator.</p> <p>9 Q. And that's the successor PR, Mr. Westendorf?</p> <p>10 A. Yes.</p> <p>11 Q. Okay.</p> <p>12 A. That was my understanding, that there is --</p> <p>13 but I distinctly asked that question, got an email</p> <p>14 back and sent that email to -- to Amy.</p> <p>15 Q. Okay. And there's a reference in the -- the</p> <p>16 last of the thread which is the top of page 1 that</p> <p>17 you will be in touch, and I presume that's with</p> <p>18 Ms. Miller, after you speak with Cory Fleming.</p> <p>19 A. I'm not sure where you're --</p> <p>20 Q. Oh, I'm sorry. I'm on the -- that's not --</p> <p>21 A. I'm on Exhibit 23.</p> <p>22 Q. That's fine. That will be our next one.</p> <p>23 A. Okay.</p> <p>24 Q. Yeah. Sorry about that.</p> <p>25 A. Uh-huh.</p>
<p style="text-align: right;">Page 91</p> <p>1 the number wasn't correct at 3.8?</p> <p>2 A. I think it was more of just verifying 3.8 --</p> <p>3 is 3.8 the total including Brit, or is it our total</p> <p>4 not including Brit?</p> <p>5 And I said, "There's no questions it's</p> <p>6 just -- it's 3.8 new money."</p> <p>7 Q. Okay.</p> <p>8 MR. PENDARVIS: Jimmy, I'm skipping the</p> <p>9 next exhibit.</p> <p>10 MR. LONG: Okay.</p> <p>11 - - -</p> <p>12 (Emails Dated 3/25/2019 marked Exhibit Number 23</p> <p>13 for identification.)</p> <p>14 - - -</p> <p>15 BY MR. PENDARVIS:</p> <p>16 Q. Mr. Grantland, I've marked as Exhibit 23 to</p> <p>17 your deposition another email thread. This one is</p> <p>18 Bates labeled Nautilus_000608 through 609. This</p> <p>19 email thread between you and Ms. Miller?</p> <p>20 A. Yes.</p> <p>21 Q. Had you had -- by -- this is March 29th, a</p> <p>22 few days after this agreement's been -- settlement's</p> <p>23 been confirmed. Had you had any conversations</p> <p>24 about -- with Cory Fleming about who may serve as a</p> <p>25 conservator for Mr. Harriott?</p>	<p style="text-align: right;">Page 93</p> <p>1 Q. Two steps ahead.</p> <p>2 - - -</p> <p>3 (Email Chain marked Exhibit Number 24 for</p> <p>4 identification.)</p> <p>5 - - -</p> <p>6 BY MR. PENDARVIS:</p> <p>7 Q. That discussion's part of what's marked as</p> <p>8 Exhibit 24, and I'm passing it to you now, and that's</p> <p>9 Nautilus_000608 and 609.</p> <p>10 A. That's right.</p> <p>11 Q. Two page.</p> <p>12 And so after you have this email thread back</p> <p>13 and forth with Ms. Miller, you spoke with Cory</p> <p>14 Fleming about --</p> <p>15 A. Yes.</p> <p>16 Q. -- who will be a conservator?</p> <p>17 A. Yes.</p> <p>18 Q. Was Nautilus involved in the appointment of</p> <p>19 a conservator --</p> <p>20 A. No.</p> <p>21 Q. -- for the estate?</p> <p>22 A. No.</p> <p>23 Q. Did Nautilus have any involvement in the</p> <p>24 estate itself, file any documents or anything of that</p> <p>25 nature?</p>

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<p>1 A. No.</p> <p>2 Q. Okay. When I say "estate," the estate of</p> <p>3 Gloria Satterfield.</p> <p>4 A. Right.</p> <p>5 - - -</p> <p>6 (Emails Dated 4/2/2019 marked Exhibit Number 25</p> <p>7 for identification.)</p> <p>8 - - -</p> <p>9 BY MR. PENDARVIS:</p> <p>10 Q. Mr. Grantland, I'm passing to you now</p> <p>11 another email thread. This is a two-page document</p> <p>12 marked Exhibit 25 to your deposition, Nautilus_000620</p> <p>13 through 621. The bottom part on page 1 describes the</p> <p>14 language requested for the settlement proceeds check,</p> <p>15 and it's -- it's listed on -- in the exhibit as -- to</p> <p>16 be made payable to Chad Westendorf as personal</p> <p>17 representative of the estate of Gloria Satterfield</p> <p>18 and Moss, Kuhn & Fleming, Attorneys. Correct?</p> <p>19 A. Yes.</p> <p>20 Q. Is that fairly ordinary?</p> <p>21 A. No.</p> <p>22 Q. Anything unusual with that?</p> <p>23 A. No.</p> <p>24 Q. Okay. And you were provided with a W9 --</p> <p>25 A. Yes.</p>	<p>Page 94</p> <p>1 unsigned documents. The first one marked Exhibit 26</p> <p>2 is titled Release. The second one marked Exhibit 27</p> <p>3 is Petition for Approval of Settlement, and Number 28</p> <p>4 is the Order Approving Settlement with the -- with</p> <p>5 the highlights.</p> <p>6 So are -- are these documents you drafted?</p> <p>7 A. We kind of drafted them collectively. I</p> <p>8 mean, I -- I think, you know, Scott Wallenger, Robert</p> <p>9 Kennedy, Cory, I mean, we -- and this is not unusual.</p> <p>10 You circulate proposed orders, proposed release, and</p> <p>11 so I can't speak to who highlighted, but we -- we may</p> <p>12 have done a draft, but we certainly circulated it to</p> <p>13 Robert Kennedy, Scott Wallenger and Cory.</p> <p>14 Q. And in particular -- and this is more of a</p> <p>15 big-picture question, but it involves all three of</p> <p>16 these documents. Did -- independent of this release</p> <p>17 and settlement agreement, did Nautilus agree to pay</p> <p>18 any attorney's fees to the Satterfields for whatever</p> <p>19 attorney's fees they had to pay?</p> <p>20 A. No.</p> <p>21 Q. It was a lump sum settlement, and whoever --</p> <p>22 whatever attorney's fees they paid was their issue,</p> <p>23 correct?</p> <p>24 A. Right. Yeah.</p> <p>25 Q. So to your understanding, neither -- no --</p>	
<p>1 Q. -- from Moss Kuhn Fleming?</p> <p>2 A. Yes.</p> <p>3 Q. And, again, that's fairly typical?</p> <p>4 A. Yes.</p> <p>5 Q. Required almost.</p> <p>6 A. Yes.</p> <p>7 Q. All right.</p> <p>8 - - -</p> <p>9 (Release marked Exhibit Number 26 for</p> <p>10 identification.)</p> <p>11 - - -</p> <p>12 (Petition for Approval of Settlement marked</p> <p>13 Exhibit Number 27 for identification.)</p> <p>14 - - -</p> <p>15 (Order Approving Settlement marked Exhibit Number</p> <p>16 28 for identification.)</p> <p>17 - - -</p> <p>18 BY MR. PENDARVIS:</p> <p>19 Q. Before I even pass these three exhibits to</p> <p>20 you, I'm going to apologize. I'm not sure when the</p> <p>21 highlights got on Exhibit -- what's going to be</p> <p>22 marked as Exhibit 28, but they're here --</p> <p>23 A. Right.</p> <p>24 Q. -- and I'm going to pass to you now three</p> <p>25 exhibits. These are marked confidential, and they're</p>	<p>Page 95</p> <p>1 none of these documents have any obligation where</p> <p>2 Nautilus had to pay attorney's fees in addition to</p> <p>3 the \$3.8 million it tendered or it settled the claim</p> <p>4 for, correct?</p> <p>5 A. That's correct. Yeah.</p> <p>6 Q. Okay. So the total gross settlement was</p> <p>7 4,305,000?</p> <p>8 A. Right.</p> <p>9 Q. That included the 3.8 and the monies from</p> <p>10 Lloyd's --</p> <p>11 A. From Brit.</p> <p>12 Q. -- Brit?</p> <p>13 A. Correct.</p> <p>14 Q. Okay. Now, the release, of course, there</p> <p>15 was no lawsuit filed at the time, correct?</p> <p>16 A. Right.</p> <p>17 Q. So the release has no state court or federal</p> <p>18 court caption, correct?</p> <p>19 A. That's correct.</p> <p>20 Q. And same for the -- well, let's take a look</p> <p>21 at the petition marked Exhibit 27. The Petition For</p> <p>22 Approval of Settlement and the Exhibit 28 Order</p> <p>23 Approving Settlement have caption styles on the top,</p> <p>24 correct?</p> <p>25 A. Yes.</p>	<p>Page 97</p>

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1 Q. And they're both styled "In Re: Gloria
2 Satterfield" with no docket number?
3 A. Yes.
4 Q. Okay. Was there a discussion about why that
5 was to be that way?
6 A. That was discussed at the mediation. I'm
7 not sure who came up with that idea, but that's --
8 that was kind of what was agreed to. If we got the
9 settlement, this would -- that would be a part of it,
10 was both the Satterfield -- my understanding, both
11 Satterfields and -- and Alex wanted it "In Re: Gloria
12 Satterfield."
13 Q. Okay. And there was a Satterfield estate,
14 correct?
15 A. Right.
16 Q. And this was a claim that -- one part of the
17 claim was a claim that belonged to the estate,
18 right --
19 A. Right.
20 Q. -- the survival claim?
21 A. Right.
22 Q. Okay. In general, are -- those are fairly
23 typical form documents, I'll call them, for Release,
24 Petition For Settlement and Order Approving
25 Settlement, correct?

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1 prior page, but she is asking, you know -- you know,
2 "Don't the plaintiff's attorneys typically prepare
3 these?"
4 And you're responding when you say -- could
5 you read that?
6 A. I mean, that -- I basically said, "In South
7 Carolina defense counsel typically prepare court
8 approval documents. The only time a plaintiff's
9 counsel will do it if there's no counsel for the
10 defendant. More often than not, we do the
11 documents."
12 Q. Okay. I loved her response: "'I see,' said
13 the blind man."
14 MR. PENDARVIS: Okay. And my apologies
15 for those of us in the room and on the phone. I
16 got an email copy of one of the documents I just
17 believed I had included in the package, but it
18 was not.
19 - - -
20 (Letter Dated 4/22/2019 marked Exhibit Number 30
21 for identification.)
22 - - -
23 BY MR. PENDARVIS:
24 Q. I'm going to pass to you now a letter marked
25 Exhibit 30 from you to Mr. Fleming, and this is

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1 A. Yes.
2 Q. Is there anything out of the ordinary you
3 saw in...
4 A. Not really. I mean, you -- I mean, there --
5 you have to have the same language in most all of
6 your petitions and your -- and your orders, and you
7 just -- you tweak it for a particular case, but
8 generally, it's the -- it's a form document.
9 Q. Okay.
10 - - -
11 (Email Chain marked Exhibit Number 29 for
12 identification.)
13 - - -
14 BY MR. PENDARVIS:
15 Q. Earlier, we were discussing about who
16 prepared documents and things of that nature. I'm
17 going to pass to you now an email thread marked
18 Exhibit 29 to your deposition. This is an email
19 thread that ended on April 17, 2019, between you and
20 Ms. Miller; is that correct?
21 A. Yes.
22 Q. And for the record, this is Nautilus_000660
23 through 662.
24 And I see at the bottom you're explaining --
25 you're responding to an email from Ms. Miller on the

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1 M&G000020 which is a copy of a cover letter from you
2 to Mr. Fleming enclosing the \$3,800,000 check, and
3 there is some issues in this lawsuit about what's
4 stated in the second full paragraph. Could you read
5 that in, please?
6 A. "Please hold these settlement funds in trust
7 until the Petition and Order Approving Settlement
8 have been signed and filed in the probate court
9 settlement hearing."
10 Q. Okay. Was there a probate court settlement
11 hearing?
12 A. That -- we were -- it was -- we were
13 planning to go to probate court until the week before
14 Judge Mullen heard it. Cory told me that they can't
15 get a hearing, and Judge Mullen -- they -- Judge
16 Mullen will work them in or work -- work the case in,
17 and so we changed the caption from probate court to
18 common pleas, but the original plan was to go to
19 probate court.
20 Q. I'm not going to include the copy of the
21 check.
22 A. No.
23 Q. But it was a \$3,800,000 check --
24 A. Right.
25 Q. -- included with this correspondence.

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	Page 102	Page 104
1	A. Right.	1
2	Q. Via FedEx, correct?	2 (Emails Dated 5/6/2019 marked Exhibit Number 32
3	A. Right.	3 for identification.)
4	Q. It was overnight delivered?	4 - - -
5	I'll tell you what. It's -- let me do put	5 BY MR. PENDARVIS:
6	that in.	6 Q. All right. Mr. Grantland, I'm passing to
7	- - -	7 you a document marked Exhibit 32 to your deposition.
8	(Copy of Check marked Exhibit Number 31 for	8 This is another email thread Bates labeled
9	identification.)	9 Nautilus_000678 through 679.
10	- - -	10 A. Right.
11	BY MR. PENDARVIS:	11 Q. Is this an email between you and Ms. Miller?
12	Q. I'm going to pass to you now a two-page	12 A. Yes.
13	exhibit marked as Exhibit 31, and it's marked as	13 Q. The bottom part of page 1 of this exhibit
14	Bates number Nautilus_002565 through 2566.	14 discuss -- explains to her, I think, what you've just
15	Is this a copy of -- the first page of this	15 said a moment ago, that -- difficulties getting heard
16	exhibit, is this a copy of the check that was sent to	16 in probate court, and it was going to be coordinated
17	Mr. Fleming on April 22 --	17 through a circuit court judge.
18	A. Yes.	18 A. Right.
19	Q. -- 2019?	19 Q. And that ultimately turned out to be Judge
20	And on the second page, is this the	20 Carmen Mullen?
21	endorsement that was added to that check --	21 A. That's correct.
22	A. I mean, I wouldn't have --	22 Q. And the final paragraph on that email or
23	Q. -- to your knowledge?	23 actually the middle paragraph said, "So by the way,
24	A. I would not have seen this, but that's what	24 Alex's son was arraigned today"?
25	it appears to be.	25 A. Right.
	Page 103	Page 105
1	Q. Okay. And it appears to have been	1 Q. Was that -- why were you discussing that
2	deposited --	2 with Ms. Miller?
3	A. Right.	3 A. You know, it just -- she had -- you know,
4	Q. -- into the account of Moss, Kuhn & Fleming,	4 the boat -- the boat crash occurred, you know, right
5	PA?	5 before the mediation, and, yeah, I'm not sure
6	A. Right.	6 exactly -- it was in the news, and I just mentioned
7	Q. Do you recognize the signature?	7 it to her, but...
8	A. No. I mean, it says "Chad Westendorf as	8 Q. Let me rewind back to the mediation --
9	Personal Representative." I assume that's	9 A. Yeah.
10	Mr. Westendorf.	10 Q. -- itself. Was there any discussion during
11	Q. Before the -- this mediation, had you ever	11 the mediation between you and Alex about the boat
12	met Mr. Westendorf before?	12 crash?
13	A. No.	13 A. Just that he was upset about it, and, you
14	Q. And it was basically just a handshake at the	14 know, he really wanted to get this -- this case
15	beginning?	15 settled. But we didn't get into specifics of what
16	A. That's it.	16 happened.
17	MR. PENDARVIS: Okay. If anybody wants	17 Q. Right.
18	a break or anything, let me know. Just went --	18 A. Yeah.
19	I've got a few exhibits. I'm getting close to	19 Q. But, I mean, as far as it may have affected
20	the end.	20 resolution or not of the claim by the Satterfield
21	Christy, if you need a break or	21 estate, was there any concern about the boat wreck
22	anything, just let me know. I didn't --	22 having any impact?
23	MS. ALLEN: I'm all good.	23 A. No. Just -- he just really needed to get
24	MR. CLEMENT: I'm good.	24 this -- this case behind him, the Satterfield case
25	MR. PENDARVIS: Okay.	25 behind him.

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<p>1 Q. Okay.</p> <p>2 ---</p> <p>3 (Emails Dated 5/10/2019 marked Exhibit Number 33</p> <p>4 for identification.)</p> <p>5 ---</p> <p>6 BY MR. PENDARVIS:</p> <p>7 Q. And, Mr. Grantland, I'm passing to you now</p> <p>8 another email chain. This one is marked as Exhibit</p> <p>9 33 to your deposition, and it's Bates labeled</p> <p>10 Nautilus_000681 through 682.</p> <p>11 A. Yes.</p> <p>12 Q. Is this an email thread between you and</p> <p>13 Ms. Miller?</p> <p>14 A. Yes.</p> <p>15 Q. The bottom portion on page 1 is an email</p> <p>16 from you to Ms. Miller saying, "We're doing the court</p> <p>17 approval on Monday"?</p> <p>18 A. That's correct.</p> <p>19 Q. And page -- the second page --</p> <p>20 A. Uh-huh.</p> <p>21 Q. -- the earlier email, you were explaining --</p> <p>22 this is an email from Cory to you on page 2 of</p> <p>23 Exhibit 33, correct?</p> <p>24 A. That's right.</p> <p>25 Q. And were you involved in getting it</p>	<p>Page 106</p> <p>1 A. I tried. Well, I went to Beaufort, and I</p> <p>2 was -- I was -- Cory said he would handle it, and</p> <p>3 then I talked to Scott Wallenger, and somebody</p> <p>4 needs -- Scott said he not coming -- he's not going,</p> <p>5 so I said, "Well, I better go."</p> <p>6 And I went to Beaufort, hung out there, made</p> <p>7 calls, found out they're in Hampton, got in the car,</p> <p>8 and then I found out it was over.</p> <p>9 Q. "They" being Judge Mullen and Mr. Fleming?</p> <p>10 A. Right.</p> <p>11 Q. Do you know if anyone else attended?</p> <p>12 A. I've been told Mr. Westendorf was there. I</p> <p>13 don't know. But -- but I --</p> <p>14 Q. You weren't there.</p> <p>15 A. I wasn't there.</p> <p>16 Q. Okay.</p> <p>17 A. I -- again, I was of the impression that it</p> <p>18 was in Beaufort, and that's where Judge Mullen's</p> <p>19 chambers are, and that's where I went.</p> <p>20 Q. Okay.</p> <p>21 MR. PENDARVIS: Christy, I'm going to</p> <p>22 use one of the -- I didn't get -- we did not</p> <p>23 print a copy of this cover letter from Cory to</p> <p>24 Alex, and so it's got "Defense Exhibit." You</p> <p>25 mind if I put a label on top of that?</p>
<p>1 scheduled -- the hearing for the wrongful death</p> <p>2 settlement approval scheduled with Judge Mullen?</p> <p>3 A. No. Cory said he would set that up, and</p> <p>4 he'd let us know --</p> <p>5 Q. Okay.</p> <p>6 A. -- when he was going to do it, when it would</p> <p>7 be done.</p> <p>8 Q. And his -- the second sentence is, "Have you</p> <p>9 sent me the paperwork?"</p> <p>10 And that's -- that's --</p> <p>11 A. That's right. I mean, again, up until -- I</p> <p>12 mean, we were -- we -- we were all set to do probate</p> <p>13 court, and then we were, "Okay. We're going to do</p> <p>14 common pleas." And, "Who's going to be the judge?"</p> <p>15 And, you know, we -- you know, he wanted --</p> <p>16 so we -- I know that -- we knew that -- we didn't</p> <p>17 have, like -- we didn't have a roster and -- where</p> <p>18 you have court approval hearings or status</p> <p>19 conferences. It was just -- we were just being</p> <p>20 thrown in somewhere, and, you know, we found out on</p> <p>21 Friday that she wants to see us on Monday morning, so</p> <p>22 we had to scramble and finish whatever we were doing</p> <p>23 to get it -- get the order to him.</p> <p>24 Q. Did you attend the settlement conference on</p> <p>25 Monday?</p>	<p>Page 107</p> <p>1 MS. ALLEN: No. That's fine.</p> <p>2 MR. PENDARVIS: Does it matter?</p> <p>3 MS. ALLEN: No, no. You go ahead. No</p> <p>4 problem.</p> <p>5 MR. PENDARVIS: Okay. It was marked as</p> <p>6 Number 7.</p> <p>7 MS. ALLEN: That's fine. I just -- as</p> <p>8 long as it keeps the Bates label --</p> <p>9 MR. PENDARVIS: Yeah.</p> <p>10 MS. ALLEN: -- that's no problem.</p> <p>11 MR. PENDARVIS: Yeah.</p> <p>12 ---</p> <p>13 (Letter Dated 5/13/2019 marked Exhibit Number 34</p> <p>14 for identification.)</p> <p>15 ---</p> <p>16 (Order Approving Settlement Dated 5/13/2019</p> <p>17 marked Exhibit Number 35 for identification.)</p> <p>18 ---</p> <p>19 BY MR. PENDARVIS:</p> <p>20 Q. Okay. Mr. Grantland I'm passing to you two</p> <p>21 documents marked as Exhibits 34 and 35, respectively.</p> <p>22 This is -- the cover is a letter from Cory Fleming to</p> <p>23 you, and the second exhibit is an "Order Approving</p> <p>24 Settlement" that's signed by Judge Mullen. I'm going</p> <p>25 to pass those to you.</p>

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<p>1 MS. ALLEN: That order is the one that 2 you submit -- that you sent around, Thomas, that 3 copy?</p> <p>4 MR. PENDARVIS: Yes, it is. Exhibit 8 5 was -- and I -- for the record, Exhibit 8 is 6 Nautilus_002286 through 2289.</p> <p>7 MS. ALLEN: No, no. You don't need 8 Exhibit 8.</p> <p>9 MR. PENDARVIS: Yeah, I do. That would 10 have been your Exhibit 8.</p> <p>11 MS. ALLEN: Right. But you sent it -- 12 you gave him yours.</p> <p>13 MR. PENDARVIS: Yes, I gave him mine.</p> <p>14 MS. ALLEN: And what -- and it had 15 Nautilus --</p> <p>16 MR. PENDARVIS: The only one that came 17 from you was the cover letter.</p> <p>18 MS. ALLEN: Gotcha. Okay.</p> <p>19 BY MR. PENDARVIS:</p> <p>20 Q. Mr. Grantland, did you receive this letter 21 from Mr. Fleming?</p> <p>22 A. Not in -- the first time I saw this letter 23 was in 2021 --</p> <p>24 Q. Okay.</p> <p>25 A. -- when -- when I either got it from you or</p>	<p>Page 110</p> <p>1 when everything broke, then I looked in -- looked in 2 the file, and I saw that I had an emailed order from 3 Cory, but I -- I think you and I talked and Judge 4 Mullen talked, and she emailed me this letter.</p> <p>5 Q. Okay. And so --</p> <p>6 A. But I --</p> <p>7 Q. Well, did you follow up with Mr. Fleming 8 about getting a copy of the order approving the 9 settlement?</p> <p>10 A. No. I -- I got the order. I assumed I 11 would be getting a filed order. I sent it to the 12 client. I started closing my file.</p> <p>13 Q. "Client" being Ms. Miller?</p> <p>14 A. Yes, Ms. Miller.</p> <p>15 Q. Okay. Did you provide a copy of that to 16 Mr. Murdaugh?</p> <p>17 A. No.</p> <p>18 Q. Okay. Why not?</p> <p>19 A. I don't know. I don't know if we -- Renee 20 may have, but I honestly don't know.</p> <p>21 Q. And Renee is...</p> <p>22 A. My assistant.</p> <p>23 - - -</p> <p>24 (Email Chain marked Exhibit Number 36 for identification.)</p>
<p>1 I got it from Judge Mullen. But I never -- the only 2 order I received was by email --</p> <p>3 Q. Okay.</p> <p>4 A. -- from Cory.</p> <p>5 Q. The same day, right?</p> <p>6 A. The same day. And I was expecting to get a 7 filed order at some point, and -- or -- but I didn't 8 see this letter until 2021.</p> <p>9 Q. Did you have a signed copy of that order in 10 the file?</p> <p>11 A. The only -- the order I have is the order 12 that was emailed to me from --</p> <p>13 Q. Okay.</p> <p>14 A. From Cory.</p> <p>15 Q. Okay.</p> <p>16 A. Not -- not filed.</p> <p>17 Q. And what was the purpose of this going to 18 you in the original?</p> <p>19 A. I assumed he was -- I assumed -- you know, 20 Cory and I talked, and he said he had some probate 21 stuff to do, and he'd send me -- he would send me 22 the -- he'd file the order with some probate stuff, 23 probate documents, later, and I expected I'd be 24 getting a filed order, but, you know -- but I 25 never -- I didn't -- I -- I didn't see this. When --</p>	<p>Page 111</p> <p>1 - - -</p> <p>2 BY MR. PENDARVIS:</p> <p>3 Q. Okay. And I'm passing to you now a document 4 marked Exhibit 36 to your deposition. This is 5 another email thread. This is marked Nautilus -- 6 Bates labeled Nautilus_000683 through 684. Is this 7 sort of the file-closing email to Ms. Miller?</p> <p>8 A. That's right.</p> <p>9 Q. Thank you. It's been fun working with 10 you."</p> <p>11 A. Exactly.</p> <p>12 Q. Enjoyed that, and all? Okay.</p> <p>13 Until everything, I'll use your phrase, 14 "hit" a few years later, that was the last event in 15 your representation of the -- of Mr. Murdaugh --</p> <p>16 A. That's correct.</p> <p>17 Q. -- with the claims by the Satterfield 18 estate?</p> <p>19 A. I started closing my file on the 14th and 20 didn't think about the case again.</p> <p>21 Q. Are -- did your representation include 22 anything about the administration of the -- how the 23 settlement proceeds were administered through the 24 probate estate of Gloria Satterfield?</p> <p>25 A. No. I mean, again, we -- I was of the</p>

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1 impression that it was going to be a structure	1 - - -
2 through Forge, and there would be a conservator, and	2 (There was a recess from 12:23 to 12:29.)
3 that was -- you know, we -- we wanted to -- we had a	3 - - -
4 structure person, and we said, "We'll put our	4 EXAMINATION
5 structure person in touch with your structure	5 - - -
6 person."	6 BY MR. HOOD:
7 And, I mean, there are just tax implications	7 Q. All right. John, just a couple questions.
8 that if -- if you just give a lawyer cash and they --	8 Other than Tonya -- or Tanya and Cory, did you have
9 as opposed to it going from the insurance company to	9 any discussions in the course of your involvement in
10 the structure broker. So we had -- Cory and I had	10 the underlying case with anyone else at Moss & Kuhn?
11 that discussion, and he said, "No, this is how we	11 A. No.
12 want to do it."	12 MR. HOOD: Thank you. That's all I
13 Q. Okay.	13 have. Told you it would be grueling.
14 A. And -- but that's -- so we didn't --	14 MR. CLEMENT: Do you want to go or do
15 ultimately had no -- we just sent it to him, and we	15 you want --
16 assumed it would be going to Forge and be a	16 MS. ALLEN: I'll go. That's fine. I'll
17 conservator.	17 go and --
18 Q. But none of those responsibilities were	18 MR. LONG: Okay.
19 yours --	19 MS. ALLEN: Okay. And I've got
20 A. No.	20 exhibits.
21 Q. -- or Nautilus Insurance Company, correct?	21 - - -
22 A. No, no. But we -- we assumed it -- some of	22 (A discussion was held off the record
23 it would be structured, and we had a structure broker	23 regarding exhibit numbering.)
24 ready to go to talk to Forge, and Cory said, "This is	24 - - -
25 how we want to do it." And that's what we did.	25 MS. ALLEN: Okay. So they're going to
Page 115	Page 117
1 Q. So once the -- the non-structuring decision	1 be different numbers than what I sent you.
2 was made, that was it for Nautilus --	2 MR. LONG: Okay.
3 A. Right.	3 MS. ALLEN: But I brought some copies.
4 Q. -- right?	4 I brought copies in case.
5 A. Right.	5 MR. LONG: How do you want to handle it?
6 Q. Would -- would Nautilus have been required	6 MS. ALLEN: Well, we said --
7 to attend any conservator hearings?	7 MR. LONG: You just going to hand them
8 A. No.	8 to him and --
9 Q. How about, would Nautilus or Mr. Murdaugh	9 MS. ALLEN: I'm going to put new
10 have been required to attend any probate allocation	10 stickers on them.
11 hearings on whatever may have happened in probate	11 MR. LONG: Okay.
12 court with these settlement proceeds?	12 MS. ALLEN: And, I mean --
13 A. Not -- not -- I mean, we had a release. We	13 MR. LONG: Sounds good.
14 had an order. I mean, it was -- it was over.	14 MS. ALLEN: If that's okay. And I'll
15 Q. That's --	15 just use these different stickers so we don't
16 A. Yeah.	16 have repeat numbers. So my Number 1, I'm going
17 Q. That's the goal, right --	17 to put a 37 on it. But let me -- I'll put that
18 A. Right.	18 on the record as soon as we get going. And I've
19 Q. -- to get the release?	19 got copies if anybody else wants them, but --
20 A. Uh-huh.	20 MR. LONG: Well, I can probably just --
21 MR. PENDARVIS: Okay. No further	21 MS. ALLEN: Yeah. Okay. I'll put that
22 questions for me for now.	22 one down here.
23 THE WITNESS: Okay.	23 - - -
24 MR. CLEMENT: Can we take a break?	24 EXAMINATION
25 MR. PENDARVIS: Yeah.	25 - - -

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<p style="text-align: right;">Page 118</p> <p>1 BY MS. ALLEN:</p> <p>2 Q. All right. Mr. Grantland, I'm Christy</p> <p>3 Allen. I represent Chad Westendorf, and I've got a</p> <p>4 couple of exhibits, and as a follow-up, I'm going to</p> <p>5 kind of jump around.</p> <p>6 A. Okay.</p> <p>7 - - -</p> <p>8 (Email Dated 6/13/2019 marked Exhibit Number 37</p> <p>9 for identification.)</p> <p>10 - - -</p> <p>11 BY MS. ALLEN:</p> <p>12 Q. What I have given you is an email that's</p> <p>13 marked as Exhibit Number 37. If you would, take a</p> <p>14 look at it. Had you seen this email -- this is an</p> <p>15 email dated June 13, 2019, and it says it's printed</p> <p>16 out, it looks like, from Renee Dillon based on the</p> <p>17 top of the paper. It's got Murphy & Grantland Bates</p> <p>18 Number M&G001960.</p> <p>19 Had you seen this email prior to getting it</p> <p>20 in advance of this deposition?</p> <p>21 A. The first time I saw this email was in 2022.</p> <p>22 Q. Okay. In what context?</p> <p>23 A. ODC asked us to -- we submitted all of our</p> <p>24 emails and documents and files to ODC, and then they</p> <p>25 asked us for emails from Renee Dillon --</p>	<p style="text-align: right;">Page 120</p> <p>1 Q. Okay. You agree it does says, "Plaintiff's</p> <p>2 counsel mailed us" -</p> <p>3 A. Yes. Oh, yes.</p> <p>4 Q. -- "the original signed order."</p> <p>5 A. Uh-huh.</p> <p>6 Q. So based on this -- and, now, have you</p> <p>7 talked with her about this email?</p> <p>8 A. Yes. She doesn't remember -- she doesn't</p> <p>9 remember anything.</p> <p>10 Q. Okay. And --</p> <p>11 A. I mean, the reason I said it could have been</p> <p>12 based on his email is because we don't have -- we</p> <p>13 don't have that letter in our file where he sends</p> <p>14 us -- sending us -- sent --</p> <p>15 Q. "The please find enclosed original order" --</p> <p>16 A. Order.</p> <p>17 Q. I think it says --</p> <p>18 A. Right.</p> <p>19 Q. -- it was FedEx or something?</p> <p>20 A. Right.</p> <p>21 Q. That's what you're talking about?</p> <p>22 A. Right.</p> <p>23 Q. You don't believe you guys had that in your</p> <p>24 file.</p> <p>25 A. No. We -- we -- I know we don't have it in</p>
<p style="text-align: right;">Page 119</p> <p>1 Q. Okay.</p> <p>2 A. -- and...</p> <p>3 Q. Okay. And so you -- you'll see here at --</p> <p>4 looks like Renee Dillon -- does Renee Dillon still</p> <p>5 work for you?</p> <p>6 A. She's my assistant, yes.</p> <p>7 Q. Okay. It looks like she sent an email to</p> <p>8 Judge Mullen's maybe law clerk on June 3rd of 2019,</p> <p>9 and in that email, she says that "Plaintiff's counsel</p> <p>10 has mailed us the original signed Order Approving</p> <p>11 Settlement."</p> <p>12 And then she goes on and asks Judge Mullen's</p> <p>13 law clerk, "Do you have a preference on how we should</p> <p>14 proceed?"</p> <p>15 Do you have any independent knowledge about</p> <p>16 what this email was about?</p> <p>17 A. No. I mean, I -- I know that -- again, I</p> <p>18 was surprised by this when I saw it in 2022, and I</p> <p>19 don't know if -- if we got that -- if we got an</p> <p>20 unfiled order from Cory or if she's referring to the</p> <p>21 email where Cory says he's going to put the originals</p> <p>22 in the mail --</p> <p>23 Q. Okay.</p> <p>24 A. -- but I was not -- I was not aware of her</p> <p>25 communication to Cory that we had received an order.</p>	<p style="text-align: right;">Page 121</p> <p>1 our file. I don't -- I can't --</p> <p>2 Q. Okay.</p> <p>3 A. I can't explain what happened.</p> <p>4 Q. Okay. Okay. And you talked to Ms. Dillon,</p> <p>5 and she doesn't have any independent recollection</p> <p>6 about this communication to the Court.</p> <p>7 A. No.</p> <p>8 Q. Okay. And do you have any -- any</p> <p>9 independent recollection about discussing with</p> <p>10 anybody, whether it was Cory or Renee Dillon or Alex,</p> <p>11 about how or where this original order is to be</p> <p>12 filed?</p> <p>13 A. I always assumed Cory would be filing it.</p> <p>14 Q. Okay. Okay. And if you received an</p> <p>15 original, unfiled signed order from a plaintiff's</p> <p>16 lawyer, what do you -- what would you do?</p> <p>17 A. I'd call the plaintiff's lawyer and say,</p> <p>18 "Why -- why are you sending me this order? It needs</p> <p>19 to be filed." I mean, I -- I can't think of ever</p> <p>20 having an un- -- an unfiled order. It's really not</p> <p>21 an order until it's filed.</p> <p>22 Q. Okay. All right. And so just so I</p> <p>23 understand, these emails that came from Renee Dillon,</p> <p>24 because you're not on this email, that production was</p> <p>25 maybe a supplemental production that your -- you guys</p>

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<p>1 made to the ODC.</p> <p>2 A. Yes.</p> <p>3 - - -</p> <p>4 (Email Chain marked Exhibit Number 38 for</p> <p>5 identification.)</p> <p>6 - - -</p> <p>7 BY MS. ALLEN:</p> <p>8 Q. Okay. Okay. And if you will, take a look</p> <p>9 at what was Number 5 but is being marked as Exhibit</p> <p>10 Number 38.</p> <p>11 MR. LONG: You said Number 5?</p> <p>12 BY MS. ALLEN:</p> <p>13 Q. This looks to be the email, it looks like.</p> <p>14 And I think maybe we've already produced this. This</p> <p>15 has already been produced. This is May 13th in the</p> <p>16 middle where it looks like Cory sends to you an email</p> <p>17 that says, "Original to follow in mail. Thanks."</p> <p>18 And looks like you responded back, "Thank</p> <p>19 you. Keep in touch and take care."</p> <p>20 But so you -- you -- you did have that email</p> <p>21 copy --</p> <p>22 A. Right.</p> <p>23 Q. -- in your file that came with this May 13,</p> <p>24 2019, email.</p> <p>25 A. Right.</p>	<p>Page 122</p> <p>1 38 which looks like came from -- from your system --</p> <p>2 A. Yes.</p> <p>3 Q. -- right?</p> <p>4 And it looks like -- and the one on Exhibit</p> <p>5 Number 39 that came from Cory's system, it has an</p> <p>6 attachment reference with a, you know, pile of</p> <p>7 numbers, and it says PDF. You see that?</p> <p>8 A. Yes.</p> <p>9 Q. Is that a document that you've been able to</p> <p>10 identify within your email system?</p> <p>11 A. I assume it's the -- it's the order signed</p> <p>12 by Judge Mullen, the blue-inked order. That's what I</p> <p>13 assume.</p> <p>14 Q. Okay. Let me show you what I think you -- I</p> <p>15 assume you are referring to, but...</p> <p>16 - - -</p> <p>17 (Order Approving Settlement Dated 5/13/2019</p> <p>18 marked Exhibit Number 40 for identification.)</p> <p>19 - - -</p> <p>20 BY MS. ALLEN:</p> <p>21 Q. I'll show you what we'll mark as Exhibit</p> <p>22 Number 40, which was 8.</p> <p>23 All right. Mr. Grantland, I've handed you</p> <p>24 what looked -- is -- appears to be a signed order</p> <p>25 approving settlement with blue signature initials and</p>
<p>Page 123</p> <p>1 Q. All right. This -- well, let me ask you</p> <p>2 this question. This is a Bates label Murphy &</p> <p>3 Grantland 785. Okay? At the bottom of this.</p> <p>4 Do you know -- it looks like you and</p> <p>5 Ms. Dillon were copied on the May 13th email here in</p> <p>6 the middle.</p> <p>7 A. Right.</p> <p>8 Q. Right?</p> <p>9 And he says, "Original to follow in mail."</p> <p>10 And this email does not show that there is</p> <p>11 an attachment based on the information.</p> <p>12 - - -</p> <p>13 (Email Chain marked Exhibit Number 39 for</p> <p>14 identification.)</p> <p>15 - - -</p> <p>16 BY MS. ALLEN:</p> <p>17 Q. And let me ask you -- let me show you what</p> <p>18 I'm going to mark as Exhibit Number 39, which was</p> <p>19 originally marked as 6. This is the document. On</p> <p>20 the right-hand corner, it says CHF_00015. And I'll</p> <p>21 represent to you that it appears to be the same</p> <p>22 email. Meaning, this one on Exhibit Number 39 looks</p> <p>23 to be from Cory to you copied to Renee Dillon on May</p> <p>24 13th, "Original to follow in the mail," it says. It</p> <p>25 appears to be the same as the one in Exhibit Number</p>	<p>Page 125</p> <p>1 signature page, right?</p> <p>2 A. Yes, ma'am.</p> <p>3 Q. And then it's got Murphy & Grantland 00045</p> <p>4 through 4 -- sorry. 48 --</p> <p>5 A. Yes.</p> <p>6 Q. -- right?</p> <p>7 And so what do you -- why is it that you</p> <p>8 believe that this document is the one that was</p> <p>9 attached to the May 13, 2019, email in Exhibits 38</p> <p>10 and 39?</p> <p>11 A. I remember receiving an order by email, and</p> <p>12 I forwarded it to the client, and, I mean, I believe</p> <p>13 this is the email that I received -- this is the</p> <p>14 order I received by email.</p> <p>15 Q. Okay. And so you -- so you think you got --</p> <p>16 you received this order by email with the blue ink on</p> <p>17 it.</p> <p>18 A. Yes.</p> <p>19 Q. And then I believe we looked at some other</p> <p>20 correspondence where you sent that to Nautilus's --</p> <p>21 A. Right.</p> <p>22 Q. -- adjuster, correct?</p> <p>23 A. Right.</p> <p>24 Q. And you don't -- there's no indication that</p> <p>25 it was sent anywhere else.</p>

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<p style="text-align: right;">Page 126</p> <p>1 A. Right. Other than --</p> <p>2 Q. Okay.</p> <p>3 A. -- to our office.</p> <p>4 Q. And you don't -- and through your investigation, you haven't discovered that anything else happened with regard to this order other than what you've just said.</p> <p>5 A. Right. This -- this -- this is what we had in our file. We didn't -- we never got a filed order.</p> <p>11 - - -</p> <p>12 (Emails Dated 8/29/2021 marked Exhibit Number 41 for identification.)</p> <p>14 - - -</p> <p>15 BY MS. ALLEN:</p> <p>16 Q. Okay. Let me show you what we'll mark as Exhibit 41, which was 10. All right. Mr. Grantland, this at the top, again, looks like a printout. At least this copy is from Renee Dillon, based on the top, and then it's an email from Judge Mullen to you on September 29, '21, attaching files which appear to be these 5/13 letter and emails that we've been talking about with the order. You see that?</p> <p>24 A. Yes.</p> <p>25 Q. What -- why did you have this exchange with</p>	<p style="text-align: right;">Page 128</p> <p>1 trying to understand why.</p> <p>2 A. I don't know.</p> <p>3 Q. Why did this exchange happen in September of '21?</p> <p>5 A. Well, when everything just kind of broke, we're -- you know, when Alex confessed and -- "Well, where is the order; you know, what was the settlement," you know, I started receiving phone calls. And I'm not sure. I talked to a number of people, but at some point, either -- at some point Judge Mullen called me or -- I know I didn't initiate the call, but she called me and asked me, "What happened to the order?"</p> <p>14 Q. Right.</p> <p>15 A. And, you know, all I have is an emailed order --</p> <p>17 Q. Okay.</p> <p>18 A. -- or the only order I ever got was an emailed order.</p> <p>20 Q. Right. And so this -- this attachment that was forwarded to you in September, it looks like it says, "Fleming email to Grantland - original Order to follow in the mail." We looked at that one already --</p> <p>25 A. Right.</p>
<p style="text-align: right;">Page 127</p> <p>1 Judge Mullen in September 29th of '21?</p> <p>2 A. She called me, and I'm not sure whether it was from Thomas or whether it was from another lawyer -- Cory or another lawyer, but, I mean, she called, asked, "Where is the -- do you have the order?"</p> <p>7 Q. Uh-huh.</p> <p>8 A. And I said, "The only order I have is the order that was emailed to me."</p> <p>10 Q. Okay. And then -- and then it looks like she forwarded -- so she -- it looks like -- sorry. It says here there is two attachments, "2019-5-13 Fleming LT Grantland - enclosing original Order Approving Settlement.pdf." See that?</p> <p>15 A. Right.</p> <p>16 Q. And then there's another file, "2019-05-13 Fleming email to Grantland - original Order to follow in mail." You see that --</p> <p>19 A. Right.</p> <p>20 Q. -- right?</p> <p>21 Would you agree that kind of corresponds with the ones that we've been talking about today, right?</p> <p>24 A. Right.</p> <p>25 Q. And did -- she called you? I guess I'm</p>	<p style="text-align: right;">Page 129</p> <p>1 Q. -- and you -- that was one that you had received --</p> <p>3 A. Right.</p> <p>4 Q. -- back in May. And so when she sent you that, that wasn't a new email to you?</p> <p>6 A. No. But the letter enclosing original order, that's what -- I'd never seen that before.</p> <p>8 Q. Okay. And so is this the first time you saw that letter -- the letter referenced here, "Enclosing Original Order"?</p> <p>11 A. Right.</p> <p>12 Q. Okay. So that would have been September 29th --</p> <p>14 A. Right.</p> <p>15 Q. -- of '21.</p> <p>16 A. Right.</p> <p>17 Q. Okay. And I guess based on what you said earlier, the email between Renee Dillon and Judge Mullen's law clerk from 2019, that wasn't something that you discovered until even later.</p> <p>21 A. That's correct.</p> <p>22 Q. Okay. Did Ms. -- Judge Mullen make any indication to you about that exchange in any way?</p> <p>24 A. No. I -- it was a short call, but it was just about what happened to the order.</p>

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<p style="text-align: right;">Page 130</p> <p>1 Q. And when you saw that email from Renee 2 Dillon to Judge Mullen's law clerk dated June 13th -- 3 well, her email was June 3, 2019. Did you do any 4 additional searches for whether or not that original 5 document might be in her desk or in her files, for 6 example?</p> <p>7 A. I mean, I know Renee did, and I know, you 8 know, we searched the system.</p> <p>9 Q. Okay. What is your process for when you get 10 mail in, like, FedEx mail at your office? What is 11 the process?</p> <p>12 A. I mean, it goes, you know, from the file 13 room to the assistants, and the assistants scan it in 14 and stamp it, scan it in and give it to the lawyers.</p> <p>15 Q. Gotcha. Okay. All right. Let's see. Do 16 you know if anyone knows the whereabouts of the 17 original signed order?</p> <p>18 A. No.</p> <p>19 Q. Okay. Based on this email between 20 Ms. Dillon and Judge Mullen's law clerk in June of 21 2019, you would agree it's possible that she received 22 it and it just got misplaced.</p> <p>23 A. Well, she tried to file it. I'm not sure 24 what happened.</p> <p>25 Q. Okay. But you talked to her, and she</p>	<p style="text-align: right;">Page 132</p> <p>1 check to Mr. Fleming and you received back the signed 2 settlement agreement and the signed release --</p> <p>3 A. I think I got the release first.</p> <p>4 Q. Got the release first?</p> <p>5 A. Uh-huh.</p> <p>6 Q. And isn't it true that your client wanted 7 the signed release first before you released the 8 check?</p> <p>9 A. Absolutely.</p> <p>10 Q. Right. So you got the signed release from 11 the estate, and then you released the check, sent it 12 to Cory Fleming, and from your perspective, that deal 13 was done.</p> <p>14 A. Right.</p> <p>15 Q. Right.</p> <p>16 A. Absolutely.</p> <p>17 MR. MAGILL: Object to form.</p> <p>18 BY MS. ALLEN:</p> <p>19 Q. Nautilus has taken the position in this case 20 that because the order was not filed that the 21 settlement agreement was not valid. Once you receive 22 the signed release and give the check, at the time 23 your opinion was that it was valid and it was 24 complete, right?</p> <p>25 MR. LONG: Objection.</p>
<p style="text-align: right;">Page 131</p> <p>1 doesn't have a --</p> <p>2 A. She has no --</p> <p>3 Q. -- recollection about it.</p> <p>4 A. No.</p> <p>5 Q. Okay. And you'd agree -- well, I'll just 6 strike that.</p> <p>7 You didn't have any conversations with 8 Ms. Dillon about -- I think you said earlier about 9 how to file it. Like, this email says, "I've got the 10 original. How should we file it?"</p> <p>11 And then the response says, "Could you 12 please e-file it," right? Which among us, as 13 lawyers, that doesn't make sense, right --</p> <p>14 A. Right.</p> <p>15 Q. -- because it was already signed.</p> <p>16 You don't recall any conversation with 17 her --</p> <p>18 A. No.</p> <p>19 Q. -- about anything related to this 20 possibility of trying to figure out what to do with 21 this order?</p> <p>22 A. No. I -- again, I didn't know about this 23 exchange until 2022.</p> <p>24 Q. Okay. All right. Let's see. And I believe 25 you said earlier that once you sent the settlement</p>	<p style="text-align: right;">Page 133</p> <p>1 THE WITNESS: I mean, it still had to be 2 court-approved.</p> <p>3 BY MS. ALLEN:</p> <p>4 Q. Right.</p> <p>5 A. It's a death case.</p> <p>6 Q. Right. But you got the -- you got a copy of 7 the order that had the judge's signature, right?</p> <p>8 A. Right. But it wasn't, I mean -- but, I 9 mean, I got the order, and I sent it to Nautilus.</p> <p>10 Q. Okay.</p> <p>11 A. But, I mean, it's -- but except for this 12 case, all my other orders have been filed, so...</p> <p>13 Q. Right. Right. But it was court-approved, 14 though, right?</p> <p>15 A. Right.</p> <p>16 Q. And you made sure that it was court- 17 approved.</p> <p>18 A. Right.</p> <p>19 Q. Right.</p> <p>20 A. Well, I tried to.</p> <p>21 Q. Yeah. And you -- well, are you aware 22 that --</p> <p>23 A. I mean, I -- it was set up. I'm saying I --</p> <p>24 I went to the wrong courthouse.</p> <p>25 Q. I understand. I guess what I'm saying is</p>

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<p>1 you saw the order come back signed --</p> <p>2 A. Absolutely.</p> <p>3 Q. -- by Judge Mullen.</p> <p>4 A. Yes.</p> <p>5 Q. And you're not aware of any information that</p> <p>6 that's not her signature.</p> <p>7 A. That's right.</p> <p>8 Q. And you were satisfied with receipt of the</p> <p>9 copy of the order signed by the judge and approved by</p> <p>10 the judge, right?</p> <p>11 A. Yes.</p> <p>12 Q. And you forwarded that on to Nautilus --</p> <p>13 A. Yes.</p> <p>14 Q. -- in order for Nautilus to also close their</p> <p>15 file --</p> <p>16 A. Right.</p> <p>17 Q. -- right?</p> <p>18 Okay. Did you have any discussion with Alex</p> <p>19 Murdaugh about delaying the filing of the order</p> <p>20 approving this settlement?</p> <p>21 A. No.</p> <p>22 Q. Did you have any discussion with Cory</p> <p>23 Fleming about delaying the filing of this order?</p> <p>24 A. No.</p> <p>25 Q. Okay. Did you have any discussion with any</p>	<p>Page 134</p> <p>1 A. Yeah. I mean, I was -- we -- either him or</p> <p>2 Tanya. I mean, it was -- but I know we -- Cory and I</p> <p>3 talked.</p> <p>4 Q. Uh-huh. Okay. Did you understand that the</p> <p>5 order was going to be filed in the probate court?</p> <p>6 A. No. I mean, I -- well, I knew he had</p> <p>7 probate stuff to do. There are other documents when</p> <p>8 you have a court approval that, as a defense lawyer,</p> <p>9 I'm going to see, and I assumed -- I assume that it</p> <p>10 was -- you know, we were kind of rushed into doing it</p> <p>11 Monday morning --</p> <p>12 Q. Uh-huh.</p> <p>13 A. -- and -- and I would get the documents when</p> <p>14 he was ready, when he had them all prepared.</p> <p>15 Q. Okay. Did Alex ever express to you his</p> <p>16 desire to keep the settlement quiet?</p> <p>17 A. Oh, yeah. I mean, he -- and so did -- I</p> <p>18 mean, everyone wanted it -- I mean, that's -- that</p> <p>19 was one reason to go to probate court, was it was</p> <p>20 less -- I think Scott Wallenger pointed out that you</p> <p>21 might -- it might get picked up by the news if it's</p> <p>22 in circuit court or something, but --</p> <p>23 Q. Right. You and Scott talked about there</p> <p>24 being concurrent jurisdiction --</p> <p>25 A. Right, right.</p>
<p>1 person about delaying the filing of the order?</p> <p>2 A. No.</p> <p>3 Q. And in the 2019 time frame, did Cory report</p> <p>4 anything to you about the hearing that he attended</p> <p>5 with Judge Mullen in order to obtain the signature on</p> <p>6 this document?</p> <p>7 A. Just that he -- he would get -- he had some</p> <p>8 other probate stuff to do, and he -- he would send me</p> <p>9 all the file documents when he gets the probate stuff</p> <p>10 done.</p> <p>11 Q. Okay. Tell me -- do you recall -- was that</p> <p>12 a phone conversation?</p> <p>13 A. I mean, it was because I -- I -- I went to</p> <p>14 Beaufort, and they were in Hampton, and he --</p> <p>15 Q. Uh-huh. So you --</p> <p>16 A. And, "Sorry for the mix-up."</p> <p>17 And I didn't know -- and he said, "I'll</p> <p>18 email you the order, and I'll -- we have other</p> <p>19 probate" -- something to the effect that he had other</p> <p>20 probate documents to file, and he'll send me all --</p> <p>21 everything filed when he's -- when it's all done, and</p> <p>22 I assumed it would have been days later.</p> <p>23 Q. Okay. Do you recall calling him, like, from</p> <p>24 the car that day when you found out you were at the</p> <p>25 wrong courthouse?</p>	<p>Page 135</p> <p>1 Q. -- for that. Okay.</p> <p>2 And did Cory ever talk to you about keeping</p> <p>3 the settlement agreement quiet in any way?</p> <p>4 A. Other than just, you know, the Satterfield</p> <p>5 boys don't want the publicity.</p> <p>6 Q. Okay. So he did tell you that?</p> <p>7 A. Yeah, yeah.</p> <p>8 Q. Okay.</p> <p>9 A. And the -- and Alex didn't want the</p> <p>10 publicity.</p> <p>11 Q. Okay.</p> <p>12 A. And that's not -- I mean, that's -- they</p> <p>13 were -- it was consistent.</p> <p>14 Q. I think you mentioned earlier that Cory said</p> <p>15 to you that -- and either this was at or after the</p> <p>16 mediation -- that he had spoken with the Satterfield</p> <p>17 boys?</p> <p>18 A. Or with Tony.</p> <p>19 Q. Or -- well, was it Tony --</p> <p>20 A. Yes.</p> <p>21 Q. -- that he said? Okay.</p> <p>22 And you understand Tony to be -- like, who</p> <p>23 did you understand that to be at the time?</p> <p>24 A. He was a registered nurse.</p> <p>25 Q. Okay.</p>

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<p style="text-align: right;">Page 138</p> <p>1 A. And there are two sons. One son was 2 dependent upon Ms. Satterfield --</p> <p>3 Q. Okay.</p> <p>4 A. -- and didn't have a regular job.</p> <p>5 Q. Okay.</p> <p>6 A. And then Tony was independent.</p> <p>7 Q. And did Cory tell you all of -- all of those 8 things about Tony?</p> <p>9 A. I mean, I learned that along the way.</p> <p>10 Q. Okay. So you recalled Cory telling you 11 either, I guess, maybe after the mediation or at the 12 end of the mediation that he had spoken to Tony 13 Satterfield --</p> <p>14 A. Right.</p> <p>15 Q. -- right?</p> <p>16 And that if the insurance company would pay 17 the \$3.8 million --</p> <p>18 A. We'd have a deal.</p> <p>19 Q. -- then Tony would agree to accept it --</p> <p>20 A. That's correct.</p> <p>21 Q. -- right? Okay.</p> <p>22 And then I believe you just mentioned a 23 minute ago another -- something else that Cory said 24 about the Satterfield -- or Tony and the Satterfield 25 boys didn't want the publicity.</p>	<p style="text-align: right;">Page 140</p> <p>1 Q. -- since it's in the documents, that 2 indicate that you talked to Cory about why, it says, 3 the sons are not coming to the mediation. This is on 4 March 19th. Do you recall that conversation?</p> <p>5 A. Oh, yeah. We wanted them there.</p> <p>6 Q. Tell me about the conversation you had with 7 Cory about that.</p> <p>8 A. Just he -- I mean, we -- I mean, Amy Miller 9 wanted them there. You always want the -- the 10 minor -- the plaintiffs there just to hear the dollar 11 figures and to --</p> <p>12 Q. Right.</p> <p>13 A. And to be a part. And Cory said they did 14 not want to be in the same room with Alex, and they 15 didn't feel comfortable being there with Alex, and 16 they were not coming.</p> <p>17 Q. Okay.</p> <p>18 A. And I -- and it was either we go forward 19 anyway or scrap it, and we decided to go forward 20 anyway.</p> <p>21 Q. Okay. And isn't it true that either -- that 22 Cory demanded that your adjuster be there in person?</p> <p>23 A. Yes.</p> <p>24 Q. And so there had already been some 25 suggestion about people participating by phone, and</p>
<p style="text-align: right;">Page 139</p> <p>1 A. That's correct.</p> <p>2 Q. He told you that also?</p> <p>3 A. Yes.</p> <p>4 Q. Okay. Do you recall Cory saying anything 5 else about Tony Satterfield or the Satterfield boys 6 in particular which would indicate that Cory was 7 communicating with them?</p> <p>8 A. I mean, we were concerned about a 9 conservator for -- and he -- he said that there would 10 definitely be a conservator through the -- through 11 the PR, and don't -- that should not be a concern 12 and...</p> <p>13 Q. Okay.</p> <p>14 A. But, you know -- and I -- you know, before 15 mediation, we wanted them to be there.</p> <p>16 Q. Right. I was going to ask you about that 17 next.</p> <p>18 A. Yeah. I mean, we -- you know, you always 19 want the plaintiff of the -- the plaintiffs to be at 20 a mediation.</p> <p>21 Q. Uh-huh.</p> <p>22 A. And...</p> <p>23 Q. And I -- there's some entries on your bills, 24 and I'll just ask you --</p> <p>25 A. Uh-huh.</p>	<p style="text-align: right;">Page 141</p> <p>1 Cory objected to the adjuster not coming in person, 2 right?</p> <p>3 A. Right. And it's a big enough case where you 4 want your -- your person with authority to be there.</p> <p>5 Q. Sure. Right. And just like you --</p> <p>6 A. Yeah.</p> <p>7 Q. -- wanted the plaintiffs to be there --</p> <p>8 A. Absolutely.</p> <p>9 Q. -- regardless, the Satterfield sons.</p> <p>10 A. Right.</p> <p>11 Q. Right.</p> <p>12 And so after you had this phone call with 13 Cory that he said that the -- Tony Satterfield and 14 his brother were not coming, and I think you said 15 Cory told you they did not want to be in the same 16 room with Alex.</p> <p>17 A. That's right.</p> <p>18 Q. Right.</p> <p>19 He say anything else?</p> <p>20 A. That's what stands out. That's just what I 21 remember standing out. They don't want to be -- they 22 don't want to be in the same room with him.</p> <p>23 Q. Okay. And so at that moment, did you think 24 that Cory was going to be there alone?</p> <p>25 A. I mean, I assumed the PR would be there.</p>

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<p style="text-align: right;">Page 142</p> <p>1 Q. Okay.</p> <p>2 A. I mean, that was the -- you know, yeah.</p> <p>3 I -- I mean, I -- the PR is still in play.</p> <p>4 Q. Okay. And did you --</p> <p>5 A. And the PR is the plaintiff.</p> <p>6 Q. Did you confirm with Cory that the personal representative was going to be present at the mediation?</p> <p>9 A. I don't remember if we had a email or a phone -- but I know -- I know we talked about who would be there and who wouldn't be there.</p> <p>12 Q. Okay. Okay. You said earlier that you recalled meeting Chad Westendorf at the mediation or shaking his hand?</p> <p>15 A. Right. It was -- you know, it was a mediation where you go into Jon's office and you're -- you're sent to a room, but you at least shake hands with everybody beforehand --</p> <p>19 Q. Yeah.</p> <p>20 A. -- and I -- and I just remember him being identified as "the banker."</p> <p>22 Q. Okay. So Mr. Westendorf testified that he attended that mediation by phone, just to kind of tell you that.</p> <p>25 A. Right.</p>	<p style="text-align: right;">Page 144</p> <p>1 Q. Uh-huh. Okay.</p> <p>2 A. -- and Cory's in a room by himself. The banker's in a room by himself, and Jon's going -- I mean, we were -- Jon's going from room to room, but we were -- we were pretty much --</p> <p>6 Q. Okay. And so did you -- did you understand that Jon was going in and talking to Cory who was by himself in a room?</p> <p>9 A. Yes.</p> <p>10 Q. Okay.</p> <p>11 A. I mean, if Cory had gone into the room with the banker, I would not necessarily have known that.</p> <p>13 I mean, I --</p> <p>14 Q. Okay.</p> <p>15 A. When you're --</p> <p>16 Q. And did you understand that this banker, whoever that person was, was there all day?</p> <p>18 A. Yeah. As far as I know. But I wasn't -- I wasn't paying attention --</p> <p>20 Q. Okay.</p> <p>21 A. -- to that. My job was to deal with Alex and --</p> <p>23 Q. Okay.</p> <p>24 A. And...</p> <p>25 Q. And if Cory had said the Satterfield sons</p>
<p style="text-align: right;">Page 143</p> <p>1 Q. And there is some email that corroborates that in the Westendorf-Fleming correspondence.</p> <p>3 So do -- did -- did Cory represent to you that Mr. Westendorf was present?</p> <p>5 A. I don't know if he did or Jon Austen did, but I just remember somebody sitting in a room by themselves who was identified as "the banker."</p> <p>8 Q. Okay.</p> <p>9 A. And -- and, again, it was not a traditional mediation where you're all -- where you take roll and you meet everybody.</p> <p>12 Q. Right.</p> <p>13 A. We literally walked in, shook hands and...</p> <p>14 Q. Okay. So -- so you do specifically recall that there was a person there who Cory represented as the personal representative.</p> <p>17 A. Right. As "the banker."</p> <p>18 Q. But you -- you wouldn't have known if it was Chad Westendorf or some other person.</p> <p>20 A. No.</p> <p>21 Q. Okay. And do you recall anybody being there by phone?</p> <p>23 A. No. And, again, we were separated. I mean, we -- we got there. We shook hands, and then we were all in our room, and we were in a small room --</p>	<p style="text-align: right;">Page 145</p> <p>1 are not coming and the personal representative is not coming, what would you have --</p> <p>3 A. We would have --</p> <p>4 Q. What would you have said?</p> <p>5 A. -- to scrap the mediation. Let's -- you got to have a -- she's not going to fly from Arizona.</p> <p>7 Q. Okay. So you said it was a mediation where it was agreed not to do sort of opening statements and presentations, right?</p> <p>10 A. Right.</p> <p>11 Q. And so y'all went to Jon's office in Charleston --</p> <p>13 A. Yes.</p> <p>14 Q. -- right? Jon Austen's office in Charleston.</p> <p>16 And so I think you said earlier when you got there, you and your group went into one room.</p> <p>18 A. Right.</p> <p>19 Q. And then you said Cory was in one room, and you recall another person who you understood was Chad Westendorf was --</p> <p>22 A. Right.</p> <p>23 Q. -- in a third room.</p> <p>24 A. Right.</p> <p>25 Q. How -- were there -- were there times when</p>

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<p>Page 146</p> <p>1 your group was split up amongst yourselves for any 2 reason?</p> <p>3 A. I mean, Alex eventually went out to his 4 truck.</p> <p>5 Q. Okay. What do you mean by that?</p> <p>6 A. I mean, he -- he was upset with Amy, and I 7 told him he needed to go outside.</p> <p>8 Q. Okay. So Amy was in the room, you, Scott 9 Wallenger.</p> <p>10 A. And Robert Kennedy.</p> <p>11 Q. And Robert Kennedy. And he was from -- 12 A. Phelps Dunbar.</p> <p>13 Q. Okay. And Alex.</p> <p>14 A. Right.</p> <p>15 Q. So that was your group.</p> <p>16 A. Right.</p> <p>17 Q. And there was a time where Alex was getting 18 upset with Amy -- 19 A. Right.</p> <p>20 Q. -- right? 21 And you told Alex, "Maybe you need to go 22 outside" -- 23 A. Right.</p> <p>24 Q. -- "and take a break." 25 A. Right.</p>	<p>Page 148</p> <p>1 A. There was -- there was definitely tension in 2 the beginning --</p> <p>3 Q. Uh-huh.</p> <p>4 A. -- and -- and, I mean, he's -- Alex's upset 5 with her. Alex's pointing his finger at her. He may 6 have poked her in the chest.</p> <p>7 Q. He may have physically poked her?</p> <p>8 A. Just -- just -- just, you know, "You need to 9 do this." Just that kind of hand gesture.</p> <p>10 And we -- that's when we said, "Alex, you 11 need to go outside."</p> <p>12 Q. Okay.</p> <p>13 A. But that -- and they stay separated.</p> <p>14 Q. Okay. So if you're -- 15 A. If they got together at the end, it was 16 basically just to say sorry and -- or, "We're working 17 on trying to get it resolved." And that was that.</p> <p>18 Q. Okay. And so the only sort of, I mean -- 19 and I don't use the word altercation.</p> <p>20 A. Right. No.</p> <p>21 Q. I don't mean to make it bigger than what you 22 just said, but only sort of -- you know, sort of 23 negative interaction that you recall was when all of 24 you were together?</p> <p>25 A. And Alex --</p>
<p>Page 147</p> <p>1 Q. And how long did he stay out there? 2 A. He stayed out there pretty much most of -- 3 most of the day in his -- in the cab of his truck. 4 Q. Oh. Okay. 5 A. I don't know -- I don't remember how long 6 the day was. I know we were breaking maybe 2:00 or 7 3:00. 8 Q. Okay. And was there ever a time that you 9 recall there being any sort of presentation to a 10 bigger group than just those people that were in your 11 room? 12 A. No. 13 Q. Okay. Did Cory represent to you that he was 14 conferring with whoever the banker was about the 15 settlement discussions? 16 A. No. The only time -- the only thing Cory 17 told me was if we get to -- if we can get to 3.8, 18 Tony would agree to take it. Or Tony -- he talked to 19 Tony, and if we got to 3.8, we could settle. 20 Q. Okay. There is reference in some of the -- 21 there's been reference of some sort of interaction 22 between Alex and, I guess, Amy at the conclusion of 23 that day whereas maybe Amy was trying to leave, and 24 Alex wanted her to go back. Does that -- do you have 25 any independent recollection of anything about that?</p>	<p>Page 149</p> <p>1 Q. And Alex got -- 2 A. -- wants it -- wants it done. 3 Q. Okay. And he was -- 4 A. Wants to get it done right away. 5 Q. Did he raise his voice? 6 A. No more than typical. No more than his 7 normal voice. 8 Q. Which is somewhat loud, right? 9 A. Right. 10 Q. Is that what you're trying to say? 11 A. Yeah, yeah, yeah. 12 Q. He's not a soft-spoken person, right? 13 A. Right. That's right. 14 Q. Okay. Okay. And then you told him, "You 15 should probably go outside"? 16 A. Yeah. 17 Q. And then -- 18 A. Well, I walked out with him, just, "You need 19 to cool off. We're not going to get this done if 20 you're fussing at the adjuster. You know, you're 21 just not -- you need to be -- just let us do our 22 job." 23 Q. And did you go back out? Did you, like, go 24 back out to Alex -- 25 A. Oh, yeah.</p>

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<p style="text-align: right;">Page 150</p> <p>1 Q. -- just to let him know what's going on a 2 couple times?</p> <p>3 A. Yeah. Absolutely. A lot.</p> <p>4 Q. Okay.</p> <p>5 A. He's dipping, and I'm out there just talking 6 to him.</p> <p>7 Q. Okay. And -- and how -- what do you recall 8 about how that day ended?</p> <p>9 A. Just that Jon came up with -- I mean, they 10 were -- they were at 4.5 and north of 4.5, and Jon 11 said, "I'm going to do a proposal."</p> <p>12 And he gave -- he gave us the proposal, and 13 we did not have that authority, and -- but we asked 14 for an extension or at least to hold it up open, and 15 Cory agreed to hold it up.</p> <p>16 And then later Cory said, "If you can get to 17 that number, we'll accept it."</p> <p>18 Q. Okay. So Cory didn't tell you the day of 19 the mediation that he had talked to Tony and --</p> <p>20 A. No. He did.</p> <p>21 Q. Or did he --</p> <p>22 A. He did --</p> <p>23 Q. So that --</p> <p>24 A. Before we left.</p> <p>25 Q. Before you left he told you that.</p>	<p style="text-align: right;">Page 152</p> <p>1 depositing that check directly into his trust 2 account, right?</p> <p>3 A. Of course.</p> <p>4 Q. And Cory never said that Chad Westendorf was 5 going to do anything with that check.</p> <p>6 A. I mean whatever -- I didn't ask that 7 question. I mean, Chad's the PR of the estate, so I 8 wouldn't...</p> <p>9 Q. I believe you said earlier that both the 10 Satterfields and Alex wanted the caption to read "In 11 Re: Gloria Satterfield" which is the caption on the 12 settlement papers.</p> <p>13 A. And I think that was discussed at mediation. 14 I think in the settlement -- if we had a proposed -- 15 if we came to an agreement, that was one of the 16 conditions, is that the settlement documents would be 17 "In Re."</p> <p>18 Q. Okay. And was that --</p> <p>19 A. That was something that we discussed -- I 20 remember discussing that in Jon Austen's office.</p> <p>21 Q. Okay. And was that a condition that you 22 understood was imposed or requested from Cory?</p> <p>23 A. I mean, I -- I'm not sure whose idea was it. 24 That's -- there was -- I know that's what Alex 25 wanted, and I know that's what -- I thought -- and</p>
<p style="text-align: right;">Page 151</p> <p>1 A. Uh-huh.</p> <p>2 Q. Bear with me one second.</p> <p>3 Other than your seeing somebody at the 4 mediation that you -- it was represented to you was 5 Chad Westendorf, other than that, did you have any 6 interaction with Chad Westendorf --</p> <p>7 A. No.</p> <p>8 Q. -- ever?</p> <p>9 A. No.</p> <p>10 Q. Did Cory ever even tell you that he was 11 asking for Chad Westendorf's approval about anything?</p> <p>12 A. No.</p> <p>13 Q. Did Cory indicate that he was in regular 14 communication with Chad Westendorf about the 15 negotiations?</p> <p>16 A. No.</p> <p>17 Q. Do you recall if -- if Chad Westendorf had 18 any part in drafting the petition to approve the 19 settlement?</p> <p>20 A. I didn't send it to him. I mean, I sent 21 everything to Cory and to Scott and Robert.</p> <p>22 Q. Okay. And when you sent the settlement 23 check, which I think was introduced earlier, by FedEx 24 to Cory on April 22nd -- I mean to Cory on April 25 22nd, you fully expected that Cory would be</p>	<p style="text-align: right;">Page 153</p> <p>1 Cory agreed. I don't know if it was Cory or Alex, 2 but that was --</p> <p>3 Q. Okay.</p> <p>4 A. I just remember Jon Austen talking about, 5 "We can do" --</p> <p>6 Q. Okay. That wasn't your idea.</p> <p>7 A. No, it wasn't my idea.</p> <p>8 Q. Okay. And so it was either Alex or Cory, 9 based on what you understand --</p> <p>10 A. Right.</p> <p>11 Q. -- that suggested that that -- would you say 12 that was even a term of the agreement?</p> <p>13 A. No. Huh-uh.</p> <p>14 Q. No.</p> <p>15 A. No. I wouldn't necessarily -- I wouldn't 16 call it a term. It's just this is what -- this is 17 how we do the caption. And, again, I don't -- I just 18 remember discussing it at mediation with Jon Austen.</p> <p>19 Q. Okay. And you didn't have any objection to 20 that.</p> <p>21 A. No.</p> <p>22 Q. At the time of the mediation, was there 23 discussion about where the order would be filed?</p> <p>24 A. No. But we -- I mean, at some point after 25 that, we said we want to do it in probate court. I</p>

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1 mean, I think Scott Wallenger and I -- or at least we
2 talked about probate court would be less -- less
3 publicity than state court.

4 Q. And did you communicate that to Alex?
5 A. Yeah.

6 Q. Okay.

7 A. I mean, that's what -- I think that's
8 what -- everyone was in agreement. But then I think
9 probate court was backed up.

10 Q. Okay. And so how do you know that probate
11 court was backed up?

12 A. That's what Cory told me.

13 Q. Okay. So you didn't make any -- you didn't
14 make any efforts --

15 A. No.

16 Q. -- whatsoever about where -- to figure out
17 where to file -- where to get it approved?

18 A. Right. There -- I was just working on the
19 documents.

20 Q. Right. And you didn't care what judge
21 approved it, right?

22 A. No. I just needed it -- yeah, just need it
23 approved.

24 Q. Okay. And was -- the first time you heard
25 of Cory meeting with Judge Mullen the Friday before,

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1 Q. I'll show you just a couple more. We're
2 almost done. What will be marked as Defendants'
3 Exhibit Number 42, which is Number 2 in my original
4 file, which is a page from one of your billing
5 entries which has got a MSG002376 at the bottom.

6 All right. Mr. Grantland, this is a bill
7 from one of your -- it's a page from one of your
8 bills that you guys have produced. It looks like
9 it's dated March of 2019. There are -- let's see.
10 Looks like -- here, on March 19th it looks like you
11 reviewed and analyzed Attorney Wallenger's
12 investigative file. You see that?

13 A. Right.

14 Q. And then it also says above it that you
15 talked to Attorney Wallenger about why the plaintiff
16 is not bringing the son to mediation.

17 What do you recall about your conversations
18 with -- with Mr. Wallenger about that particular
19 issue?

20 A. I think it was just -- I think up until then
21 we -- we were acting under the assumption that the
22 Satterfield boys would be there, and then Cory said
23 they're not, and that was a concern for me. That was
24 a concern for Nautilus. That was a concern for Scott
25 Wallenger. We all were concerned about --

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1 was that about the first time that you heard about
2 that maybe Judge Mullen would be the one that --
3 A. I think it may have been a few days earlier
4 that she'll -- she'll work us in, but we didn't know
5 until that Friday that it would be on Monday.

6 Q. Okay.

7 A. I think that's...

8 Q. And that's not unusual --

9 A. No. Huh-uh.

10 Q. -- right?

11 A. No.

12 Q. As far as these approvals go, I mean, is
13 it -- you'd agree that it's typical that lawyers try
14 to find whatever judge they can --

15 A. Right.

16 Q. -- to make --

17 A. Right.

18 Q. To make the filing, right?

19 A. That's right.

20 MR. MAGILL: Object to form.

21 - - -

22 (Billing Entries marked Exhibit Number 42 for
23 identification.)

24 - - -

25 BY MS. ALLEN:

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1 Q. Uh-huh.

2 A. -- you know, they need to be there.

3 Q. Okay. And then if you look down on March
4 20th -- this is before the mediation -- it says you
5 talked with Alex about his concerns and expectations
6 at the mediation.

7 A. Right.

8 Q. And then looks like, again, on the 21st you
9 talked to him regarding the terms of the mediation.
10 Do you recall any specific conversations with him
11 prior to the mediation?

12 A. Just he wanted to make sure she was coming
13 and --

14 Q. That the adjuster was coming?

15 A. Yeah, yeah, yeah. That -- and wanted to
16 make sure they -- it was going to get done.

17 Q. Did you -- do you recall telling Alex that
18 the Satterfield sons were not attending?

19 A. I think we discussed it. But I don't
20 remember what he said.

21 Q. Okay. So you don't recall him expressing
22 any concern about that?

23 A. No.

24 Q. Do -- did Alex -- I think you mentioned
25 earlier that he told you that he had recommended that

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<p style="text-align: right;">Page 158</p> <p>1 the Satterfield sons retain Cory Fleming.</p> <p>2 A. Right.</p> <p>3 Q. Right. Do you recall Alex telling you</p> <p>4 anything else about communications that he had with</p> <p>5 the Satterfield boys?</p> <p>6 A. Just -- I mean, he -- he felt very guilty</p> <p>7 about Gloria's fall and Gloria's death, and we wanted</p> <p>8 them to be able to make a claim, and he knew Cory and</p> <p>9 trusted Cory, and -- and that -- you know, he knew</p> <p>10 that they -- just basically that Cory knew what to do</p> <p>11 to take care of them, and, you know, I didn't know</p> <p>12 until after the fact that he had maybe sent</p> <p>13 authorizations out for medical records or things like</p> <p>14 that, but I wasn't aware of that until, you know,</p> <p>15 after 2021.</p> <p>16 Q. So you didn't have -- you didn't have any</p> <p>17 information that -- that Alex had any involvement in</p> <p>18 the probate --</p> <p>19 A. In the estate. Right.</p> <p>20 Q. -- file or the estate --</p> <p>21 A. Right.</p> <p>22 Q. -- until later?</p> <p>23 A. Right. I mean, yeah. I mean, the...</p> <p>24 Q. You mentioned earlier that Mark -- Mike -- I</p> <p>25 mean, Mark Tinsley had given a PowerPoint</p>	<p style="text-align: right;">Page 160</p> <p>1 it's -- it's kind of old now. It's probably 20 years</p> <p>2 old, the -- the --</p> <p>3 Q. The PowerPoint itself?</p> <p>4 A. Or, yeah, the verdicts are over 20 years</p> <p>5 ago.</p> <p>6 Q. Okay. That's something that you regularly</p> <p>7 communicate to your defense clients who may be</p> <p>8 defendants in those counties?</p> <p>9 A. If they're -- right. It's certainly</p> <p>10 informative. If I can send it to Jim.</p> <p>11 (The stenographer asks for clarification.)</p> <p>12 THE WITNESS: I'm happy to send it to</p> <p>13 Mr. Long.</p> <p>14 BY MS. ALLEN:</p> <p>15 Q. I believe that Exhibit Number 1 was a July</p> <p>16 2018, like, legal research memo on the dog bite</p> <p>17 statute that looks like you said a law clerk sent to</p> <p>18 your law partner --</p> <p>19 A. Right.</p> <p>20 Q. -- J.R. Murphy. Do you know if that was</p> <p>21 prepared in relation to this -- to this</p> <p>22 Satterfield-Murdaugh case?</p> <p>23 A. I think J.R. was -- the claim was -- the</p> <p>24 claim came to him, and J.R. wanted an update on the</p> <p>25 dog bite statute or the case law that's been -- well,</p>
<p style="text-align: right;">Page 159</p> <p>1 presentation and that talked about verdicts in</p> <p>2 Hampton County generally.</p> <p>3 A. Right.</p> <p>4 Q. I assume that didn't relate to this case</p> <p>5 specifically --</p> <p>6 A. Right.</p> <p>7 Q. -- right?</p> <p>8 And that you showed that to Ms. Miller.</p> <p>9 A. I emailed it to her, yeah.</p> <p>10 Q. Emailed it to her. Okay.</p> <p>11 Is that a presentation that you can provide</p> <p>12 to your counsel? Well, one, I'm not aware that it's</p> <p>13 been provided -- produced in this case, and I guess</p> <p>14 my question is, is that something that you can talk</p> <p>15 with your counsel --</p> <p>16 A. Yeah.</p> <p>17 Q. -- about providing that?</p> <p>18 A. I think it's -- it may have been Allendale</p> <p>19 verdicts, maybe Allendale and Hampton, but it was a</p> <p>20 scar verdict PowerPoint, and it was just about how</p> <p>21 these nominal injuries had large damages.</p> <p>22 Q. And is that something that you often</p> <p>23 communicate to your clients when you have --</p> <p>24 defending cases in Allendale or Hampton County?</p> <p>25 A. If they don't know otherwise. I mean, I --</p>	<p style="text-align: right;">Page 161</p> <p>1 the -- you know, just -- it's a law clerk job.</p> <p>2 Q. Uh-huh.</p> <p>3 A. But basically it's just an update on the dog</p> <p>4 bite statute.</p> <p>5 Q. Okay.</p> <p>6 A. And --</p> <p>7 Q. So --</p> <p>8 A. Because it's not necessarily a dog bite. I</p> <p>9 mean, it can be -- or otherwise attacks.</p> <p>10 Q. Right. But liability --</p> <p>11 A. Yeah.</p> <p>12 Q. -- as it comes from that statute --</p> <p>13 A. Yeah.</p> <p>14 Q. -- was --</p> <p>15 A. Strict.</p> <p>16 Q. -- as the research showed.</p> <p>17 A. Yeah, yeah.</p> <p>18 Q. Do you know if you sent that to Ms. Miller?</p> <p>19 A. I didn't.</p> <p>20 Q. Okay. Do you know what communications</p> <p>21 Mr. Murphy had, if any, with Nautilus or Amy Miller</p> <p>22 about this claim?</p> <p>23 A. I'm sure they had a good bit before I got</p> <p>24 involved.</p> <p>25 Q. Okay. And -- okay. Is it your</p>

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1 understanding that those -- any emails between
2 Mr. Murphy and Amy Miller or anybody at Nautilus have
3 been -- is it your understanding that those have been
4 produced?
5 A. Yes.
6 Q. Okay. Do you know what, if anything,
7 Mr. Murphy did before you sort of stepped into the
8 case?
9 A. I mean, I think they talked -- he talked to
10 Nautilus about the options, you know. Can we remove
11 the case? You know, what are -- what if we just say,
12 "No, we don't believe it happened"?
13 Q. Okay.
14 A. What -- you know, if we just kind of go
15 through a risk analysis on -- and options on what can
16 we -- how to position the case and how to -- to deal
17 with it.
18 Q. Do you recall how it was -- or what the
19 first interaction was between your firm and Alex
20 Murdaugh about this file?
21 A. Other than I think at some point when it was
22 decided that we'll agree to go to mediation, I
23 reached out to Alex and told him, "Just -- we got it.
24 Just let us do our job." And --
25 Q. Okay. So do you think that was the first --

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1 Q. And who would usually initiate the call?
2 A. He would.
3 Q. So he would call you?
4 A. Uh-huh. Yes.
5 MS. ALLEN: I think that's all I have.
6 THE WITNESS: Thank you.
7 MS. ALLEN: Thank you.
8 - - -
9 (The stenographer requests a break.
10 There was a recess from 1:21 to 1:29.)
11 - - -
12 MR. CLEMENT: I'm going to start by
13 marking --
14 MR. CLEMENT: Are we at Exhibit 43?
15 THE STENOPHGR: I have 43, yes, sir.
16 MR. CLEMENT: Okay. All right. I'm
17 marking Exhibit 43.
18 - - -
19 (Letter Dated 11/14/2018 marked Exhibit Number 43
20 for identification.)
21 - - -
22 MR. CLEMENT: Mr. Grantland.
23 Mr. Long.
24 - - -
25 EXAMINATION

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1 do you think -- your communication to Alex saying,
2 "I'm involved," do you think that was the first
3 time --
4 A. My firm --
5 Q. -- it was -- your firm --
6 A. The first time I --
7 (Stenographer admonishes simultaneous cross-talk
8 and requests all participants take turns
9 speaking.)
10 BY MS. ALLEN:
11 Q. Do you think that was the -- do you think
12 that was the first time anybody at your firm
13 communicated to Alex about your firm being hired to
14 handle the defense?
15 A. I believe so.
16 Q. Okay.
17 A. I've seen an email from Alex to me, you
18 know, outlining his concerns.
19 Q. Okay.
20 A. And that would have been shortly after me
21 reaching out to him.
22 Q. Did Alex email you a lot?
23 A. No.
24 Q. How did you normally communicate with him?
25 A. Phone.

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1 - - -
2 BY MR. CLEMENT:
3 Q. And for purposes of the record, I'll
4 reintroduce myself. My name is Jim Clement. I
5 represent the bank in this case, Palmetto State Bank.
6 MR. LONG: You're -- let's go. This
7 one's not in the notebook.
8 Right?
9 MR. CLEMENT: Pardon?
10 MR. LONG: This one's not on the list;
11 is it?
12 MR. CLEMENT: Yeah. This is -- this is
13 one that's not in the --
14 MR. LONG: That's what I was trying to
15 tell you. Let's go.
16 - - -
17 (There was a recess from 1:30 to 1:32.)
18 - - -
19 MR. CLEMENT: All right. We ready to go
20 back on the record?
21 BY MR. CLEMENT:
22 Q. All right. Mr. Grantland, what I just
23 handed you is a letter marked Exhibit 43 dated
24 November 14, 2018. It's written by your law partner,
25 J.R. Murphy. Do you see that?

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<p style="text-align: right;">Page 166</p> <p>1 A. Yes.</p> <p>2 Q. Okay. I just want to ask you one question</p> <p>3 about it. Mr. Murphy writes in the first sentence,</p> <p>4 "I, along with John Grantland, have been retained by</p> <p>5 Nautilus Insurance Company to assist in the</p> <p>6 investigation and valuation of this claim."</p> <p>7 Do you see?</p> <p>8 A. Yes.</p> <p>9 Q. Okay. Is that consistent with your</p> <p>10 understanding of your role in this matter?</p> <p>11 A. Yes. I mean, that's -- I mean, I think at</p> <p>12 least at that point -- at that point, you know,</p> <p>13 Nautilus hired J.R. to assist in the investigation.</p> <p>14 When it was decided, you know, that we're going to</p> <p>15 take the case to mediation, you know, my job was more</p> <p>16 to be Alex's counsel, Alex's attorney at mediation,</p> <p>17 particularly with Brit settling out or Brit passing</p> <p>18 the case to us.</p> <p>19 Q. Okay. And who exactly were you to assist in</p> <p>20 the investigation and valuation?</p> <p>21 A. I mean, I -- I mean, I was assisting</p> <p>22 Nautilus in investigation. But it -- but, you</p> <p>23 know -- and in defense of Alex.</p> <p>24 Q. Sure. And is that part of the tripartite --</p> <p>25 A. Yeah.</p>	<p style="text-align: right;">Page 168</p> <p>1 could potentially make it worse, and I did not</p> <p>2 want Alex falling on a sword or giving any</p> <p>3 statements as to what happened or the value of</p> <p>4 the case or anything like that. Those were my</p> <p>5 concerns.</p> <p>6 BY MR. CLEMENT:</p> <p>7 Q. Okay. Did you tell Ms. Coryer Miller or</p> <p>8 Ms. Miller that Alex and --</p> <p>9 A. Yeah.</p> <p>10 Q. -- Cory were talking?</p> <p>11 A. I mean, I think there was -- they had talked</p> <p>12 earlier. I mean, I think I'd reached out to her</p> <p>13 before that they -- they had talked to each other,</p> <p>14 and I told Alex to be -- to shut up --</p> <p>15 Q. Sure.</p> <p>16 A. -- quit talking and let me do my job.</p> <p>17 Q. Is that unusual for --</p> <p>18 A. Yes. Highly unusual.</p> <p>19 Q. Okay. And if you can let me finish my</p> <p>20 question --</p> <p>21 A. I'm sorry.</p> <p>22 Q. -- I'd appreciate it.</p> <p>23 Is that unusual for a claim like this, a</p> <p>24 wrongful death claim, for the defense -- the</p> <p>25 defendant and the claimant's attorney to communicate?</p>
<p style="text-align: right;">Page 167</p> <p>1 Q. -- relationship?</p> <p>2 A. Right, right.</p> <p>3 Q. Okay.</p> <p>4 A. That's right.</p> <p>5 Q. All right. Earlier you were asked about the</p> <p>6 email where you wrote, "I smell a trap."</p> <p>7 A. Right.</p> <p>8 Q. Do you remember that?</p> <p>9 A. Uh-huh.</p> <p>10 Q. And Mr. Pendarvis asked you what you meant</p> <p>11 by -- by that phrase, "I smell a trap."</p> <p>12 And I believe you started to testify that --</p> <p>13 you said something like, "They were working," and</p> <p>14 then you stopped. And --</p> <p>15 A. Well, they were talking to each other.</p> <p>16 Q. Okay. And I was going to ask. Did you</p> <p>17 mean -- or did you mean to say that they, being Alex</p> <p>18 and Cory, were working together?</p> <p>19 A. Or that they were talking.</p> <p>20 MR. LONG: Objection.</p> <p>21 Go ahead.</p> <p>22 THE WITNESS: You know, I just know that</p> <p>23 they were talking, and I knew that Alex giving a</p> <p>24 statement, a deposition, you know, would not help</p> <p>25 get this case resolved. It could make it -- it</p>	<p style="text-align: right;">Page 169</p> <p>1 A. Yes.</p> <p>2 Q. Okay. I'm going to hand you what was</p> <p>3 previously marked Deposition Exhibit 18. It's the</p> <p>4 mediation statement. And I'm going to ask you some</p> <p>5 specific questions based on the content of this</p> <p>6 mediation statement, mediation position statement.</p> <p>7 Would you agree with me that -- well, let me ask you,</p> <p>8 first: Did you provide this mediation position</p> <p>9 statement to Ms. Miller before the mediation?</p> <p>10 A. Yes.</p> <p>11 Q. And to your knowledge, Nautilus knew all the</p> <p>12 information in this -- this mediation statement prior</p> <p>13 to the mediation.</p> <p>14 A. Yes.</p> <p>15 Q. Okay. So you would agree with me that</p> <p>16 Nautilus had been informed by the time of mediation</p> <p>17 that the medical records show that Ms. Satterfield</p> <p>18 reported to a neurosurgeon that she did not know why</p> <p>19 she fell?</p> <p>20 A. That's correct.</p> <p>21 Q. And you'd agree that Nautilus knew by the</p> <p>22 time of mediation that the medical records revealed</p> <p>23 that Ms. Satterfield had neuropathy and had complaint</p> <p>24 of tingling in her feet?</p> <p>25 A. That's -- that's correct.</p>

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<p style="text-align: right;">Page 170</p> <p>1 Q. And you would agree that by the time of 2 mediation Nautilus knew that Ms. Satterfield was on 3 several medications that have side effects including 4 dizziness?</p> <p>5 A. That's correct.</p> <p>6 Q. And you would agree with me that by the time 7 of mediation Nautilus knew that one of 8 Ms. Satterfield's medications, amlodipine, states 9 severe dizziness as a side effect?</p> <p>10 A. I don't know -- I don't -- if it's in my 11 letter, then, yes.</p> <p>12 Q. Okay.</p> <p>13 A. Yeah.</p> <p>14 Q. Sure.</p> <p>15 A. I'm just looking for it in the letter, yeah.</p> <p>16 Q. And would you agree with me by the time of 17 mediation you had informed Nautilus that 18 Ms. Satterfield could have simply just fallen down 19 the steps?</p> <p>20 A. That's correct.</p> <p>21 Q. And you had informed Nautilus by the time of 22 mediation that Ms. Satterfield had underlying health 23 conditions that contributed to her death.</p> <p>24 A. That's correct.</p> <p>25 Q. And you --</p>	<p style="text-align: right;">Page 172</p> <p>1 that hasn't been discussed today, so if you -- it's a 2 one-liner, so hopefully it won't take too long to 3 discuss. Or I'll take that back, that one, and give 4 you a clean copy.</p> <p>5 MR. PENDARVIS: What's the Bates number?</p> <p>6 MR. CLEMENT: This is Miller/Nautilus 7 000764.</p> <p>8 MR. LONG: You're good on this?</p> <p>9 THE WITNESS: Yes.</p> <p>10 MR. CLEMENT: I'm marking this 11 Deposition Exhibit 44. 12 - - - 13 (Email Dated 3/25/2019 marked Exhibit Number 44 14 for identification.) 15 - - - 16 BY MR. CLEMENT: 17 Q. Is this an email that you received from 18 Ms. Miller on March 25, 2019? 19 A. Yes. 20 Q. So is that about -- that's three days after 21 mediation? 22 A. Yes. 23 Q. And does she write in this email, "Hi, Jon 24 and John. I just tried to reach you both by 25 telephone. Nautilus had decided that we will accept</p>
<p style="text-align: right;">Page 171</p> <p>1 A. Well, I -- I mean, that's what Dr. Westerkam 2 said.</p> <p>3 Q. Yes, sir. And you informed Nautilus by the 4 time of mediation that Dr. Pritchard, a MUSC 5 neurosurgeon, had opined that Ms. Satterfield was 6 lucid and coherent enough to give a history of how 7 she fell and, in fact, told a neurosurgeon that she 8 did not know why she fell.</p> <p>9 A. That's right. But Dr. Pritchard was a 10 neurologist, but, yes.</p> <p>11 Q. Neurologist.</p> <p>12 A. Yeah.</p> <p>13 Q. Okay. And then you would agree with me that 14 by the time of mediation, you informed Nautilus that 15 Ms. Satterfield's multiple preexisting conditions, 16 according to Dr. Westerkam, had contributed to her 17 fall and her rapid medical decline.</p> <p>18 A. That's correct.</p> <p>19 Q. And you informed Nautilus by the time of 20 mediation that Dr. Westerkam had also opined that 21 Ms. Satterfield had an underlying cardiac condition 22 and her cause of death was multi-factorial.</p> <p>23 A. That's correct.</p> <p>24 Q. Okay. And, of course, mediation was on 25 March 22, 2019. I'm going to show you another email</p>	<p style="text-align: right;">Page 173</p> <p>1 Jon's proposal of 3.8 million. Thank you"?</p> <p>2 A. That's correct.</p> <p>3 Q. Did I -- did I read that correctly?</p> <p>4 A. Yes, sir.</p> <p>5 Q. And is that how you learned that Nautilus 6 decided to settle the case?</p> <p>7 A. Either that or returned her phone call. I'm 8 not sure which one happened first, but --</p> <p>9 Q. Okay. Was it after mediation?</p> <p>10 A. Yes.</p> <p>11 Q. -- had concluded?</p> <p>12 A. Yes.</p> <p>13 Q. Okay. And Nautilus made that decision to 14 settle for less than policy limits, right?</p> <p>15 A. That's correct.</p> <p>16 MR. MAGILL. Object to the form.</p> <p>17 MR. CLEMENT: Okay. And I think this 18 next exhibit is going to be Exhibit 27. Let me 19 see if I can find it.</p> <p>20 All right. I'll have to -- yeah. I'm 21 going to have to use my own. Sorry.</p> <p>22 I'm marking this -- I'm going to mark 23 this --</p> <p>24 MR. LONG: This isn't the same one?</p> <p>25 MR. CLEMENT: Pardon?</p>

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<p>1 MR. LONG: This isn't 27?</p> <p>2 MR. CLEMENT: I had -- no, it's not.</p> <p>3 And this is Bates stamped</p> <p>4 Miller/Nautilus 000655.</p> <p>5 MR. LONG: Let me see. I think this is</p> <p>6 already in.</p> <p>7 MR. CLEMENT: Tell me when you're ready.</p> <p>8 THE WITNESS: I haven't even seen it.</p> <p>9 MR. CLEMENT: Oh.</p> <p>10 THE WITNESS: I'm sorry. But go ahead.</p> <p>11 MR. LONG: No, no, no.</p> <p>12 MR. CLEMENT: Okay.</p> <p>13 MR. LONG: Yeah. It's already in, I</p> <p>14 think. I'll show you what number it is.</p> <p>15 MR. CLEMENT: We did discuss it. It's</p> <p>16 an email chain. I'm not sure if it's got all the</p> <p>17 emails on it or not.</p> <p>18 MR. LONG: Yeah. I was checking.</p> <p>19 MR. CLEMENT: Is it 40...</p> <p>20 MR. LONG: Yeah. It's Exhibit 29.</p> <p>21 MR. CLEMENT: 29? Okay. Why don't we</p> <p>22 just use what's in here then?</p> <p>23 MR. LONG: Take a look at it and decide.</p> <p>24 Yeah.</p> <p>25 MR. CLEMENT: I'm going to withdraw what</p>	<p>1 Mr. Fleming?</p> <p>2 A. I mean, I have a lot of opinions, but...</p> <p>3 Q. Yeah. But was his role minimal?</p> <p>4 A. Yes.</p> <p>5 Q. It was. Okay.</p> <p>6 I mean, he didn't draft pleadings.</p> <p>7 A. Right.</p> <p>8 Q. He didn't take any depositions.</p> <p>9 A. Right.</p> <p>10 Q. He didn't serve written discovery.</p> <p>11 A. Right.</p> <p>12 Q. He didn't file suit, right?</p> <p>13 A. Right.</p> <p>14 Q. And he didn't have to defend against a declaratory judgment action; did he?</p> <p>15 A. That's correct.</p> <p>16 Q. And were you aware that your colleague, J.R. Murphy, had suggested to Nautilus that it file a declaratory judgment action?</p> <p>17 A. To one of y'all's -- that -- I mean, there was a lot of issues -- those were -- that was certainly an issue that was discussed between J.R. and -- and Nautilus before I got involved, you know, what to do. You got a dog bite --</p> <p>25 Q. Sure.</p>
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<p>1 I had marked as Deposition Exhibit 45, and I'm --</p> <p>2 for the record, I'm showing Mr. Grantland</p> <p>3 Deposition Exhibit 29?</p> <p>4 THE WITNESS: Yes.</p> <p>5 BY MR. CLEMENT:</p> <p>6 Q. All right. Mr. Grantland, on the second</p> <p>7 page of that exhibit, you should see an email from --</p> <p>8 well, let me ask you. That email at the -- yep. So</p> <p>9 that email here at the top, is that an email from</p> <p>10 Ms. Miller to you sent on April 17th of 2019?</p> <p>11 A. Yes.</p> <p>12 Q. And in this email she's discussing the</p> <p>13 proposed petition for approval of settlement and</p> <p>14 proposed order. Do you see that?</p> <p>15 A. Yes.</p> <p>16 Q. And Ms. Miller writes -- you got a question</p> <p>17 about this earlier -- "Typically a plaintiff's</p> <p>18 attorney prepares a petition for approval of</p> <p>19 settlement. I'm curious as to why the estate's</p> <p>20 attorney did not prepare the petition. He did</p> <p>21 absolutely no work for a \$4,305,000 payout."</p> <p>22 Do you see that?</p> <p>23 A. Yes.</p> <p>24 Q. Did you -- or do you share that same opinion</p> <p>25 of the plaintiff's attorney in this case,</p>	<p>1 A. -- in Hampton that's worth questioning whether it occurred, and...</p> <p>3 Q. Did you and Mr. Murphy have a conversation about whether to file a --</p> <p>5 A. No. I mean --</p> <p>6 Q. -- declaratory judgment action?</p> <p>7 A. No. By the time it came to me, the decision was made where we need somebody to -- to -- you know, to work the case up for mediation and get it settled.</p> <p>10 Q. Do you know why Nautilus declined to file a declaratory judgment action?</p> <p>12 A. I have no idea.</p> <p>13 Q. Okay. Ask you -- let's see.</p> <p>14 MR. CLEMENT: Exhibit -- I'm looking for Exhibit 32. Yeah. Okay. This was -- I'm showing the witness Exhibit 32.</p> <p>17 BY MR. CLEMENT:</p> <p>18 Q. Mr. Grantland, this was an email from --</p> <p>19 let's see. Sorry. Let me get a copy real quick.</p> <p>20 MR. CLEMENT: Oh, you got it. Thank you.</p> <p>22 MR. PENDARVIS: It's got highlighting on it.</p> <p>24 MR. CLEMENT: Yeah, that's fine.</p> <p>25 BY MR. CLEMENT:</p>

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1 Q. This is an email. The bottom email is from
2 you to Ms. Miller on May 6, 2019. Do you see that?
3 A. Yes.
4 Q. Okay. And you write about the settlement
5 approval hearing moving from the probate court to the
6 court of common pleas?
7 A. Right.
8 Q. And you write, "We were originally going to
9 do the approval in probate court since that would be
10 more secretive and under the radar."
11 Did you, in fact, write that to Ms. Miller?
12 A. I did.
13 Q. And so she knew that the plan was to try to
14 keep this out of the public eye?
15 A. Yeah. I mean, yes. There was no question
16 Alex didn't want the publicity, and the Satterfields
17 didn't want the publicity, or at least that was
18 communicated.
19 MR. MAGILL: Object.
20 BY MR. CLEMENT:
21 Q. Okay. And you informed her that -- you're
22 informing her that the plan had changed, that you all
23 were going to seek approval in the court of common
24 pleas, correct?
25 A. That's correct.

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1 informing her that you're going to do the court
2 approval on Monday?
3 A. Yes.
4 Q. And she writes, "Good news. I'm anxious to
5 put this one to bed. Have a great weekend."
6 A. Yes.
7 Q. Is that right?
8 A. Yeah.
9 Q. So do you have any idea why Nautilus was
10 anxious to put this claim to bed?
11 MR. MAGILL: Object to form.
12 THE WITNESS: I mean, I can't speak for
13 Nautilus, but for me, it was a stressful case --
14 stressful claim, and we wanted -- and we were --
15 you know, once you have the court approval,
16 it's -- and get the -- once you -- once you get
17 to that point, it's over.
18 BY MR. CLEMENT:
19 Q. Did you understand that Nautilus was content
20 with the settlement that it had reached with the
21 claimant?
22 MR. MAGILL: Object to form.
23 THE WITNESS: I mean, I can't speak for
24 Nautilus, but -- but for me, I was -- I was happy
25 that we were able to get the case resolved.

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1 Q. And she didn't have any issue with that; did
2 she?
3 A. No, not that I recall.
4 Q. Okay. Do you remember her response? Well,
5 let me show you because it's not in this email chain.
6 I don't think this one has been covered today, so
7 give me just one moment. It's just the top email
8 wasn't included.
9 MR. LONG: Do you know what this is?
10 THE WITNESS: Yeah.
11 MR. LONG: You got one for me?
12 MR. CLEMENT: Yeah, I do. Let me mark
13 that one.
14 - - -
15 (Emails Dated 5/10/2019 marked Exhibit Number 45
16 for identification.)
17 - - -
18 BY MR. CLEMENT:
19 Q. All right. I'm marking this as Exhibit 45.
20 And it is Bates stamped Miller/Nautilus 000700. I
21 want to ask you specifically about the top email. Is
22 that an email that you received from Ms. Miller on
23 May 10, 2019?
24 A. Yes.
25 Q. And her email is in response to yours below

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1 BY MR. CLEMENT:
2 Q. Okay. And did Ms. Miller express similar
3 feelings to you?
4 A. I mean --
5 MR. MAGILL: Object to form.
6 THE WITNESS: Yeah. I mean, as best I
7 can recall, I mean, she was pleased with the
8 outcome and pleased with the settlement.
9 BY MR. CLEMENT:
10 Q. Okay. And I've got one additional document
11 that I want to ask you about. If you will give me
12 one moment, I think we've --
13 MR. CLEMENT: Do we have this one?
14 I'll give you a copy. This is 23 in
15 your book.
16 MR. LONG: You think it's 23?
17 MR. CLEMENT: Yes, sir. We are almost
18 there.
19 - - -
20 (A discussion was held off the record.)
21 - - -
22 MR. LONG: It's 38 in the notebook and
23 probably --
24 MR. PENDARVIS: Did I just give you the
25 wrong number?

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<p style="text-align: right;">Page 182</p> <p>1 MR. CLEMENT: No. This is the right 2 one. It was marked as Exhibit 23. 3 MR. LONG: Oh, that's not what you -- 4 that's not what you handed me. 5 MR. PENDARVIS: Nautilus_683. 6 MR. LONG: That's not what you handed 7 me. 8 MR. CLEMENT: Oh. Oh, okay. Yeah. I'm 9 sorry. 10 MR. LONG: You handed me something 11 different. I mean, I have -- 12 MR. CLEMENT: Yeah. We've got it in 13 here somewhere. We'll find it. 14 MR. PENDARVIS: I may have written down 15 the wrong exhibit number on my little copy. 16 MR. CLEMENT: That's okay. Well -- 17 MR. PENDARVIS: It's 33. 18 MR. CLEMENT: 33? Okay. 19 MR. LONG: Exhibit 33? 20 MR. PENDARVIS: Yeah. 21 MR. CLEMENT: Yes, sir. 22 MR. LONG: That's the one you just 23 showed me. 24 THE WITNESS: That's what you just 25 showed me. Actually, that's in there. I thought</p>	<p style="text-align: right;">Page 184</p> <p>1 MR. CLEMENT: -- 36. 2 BY MR. CLEMENT: 3 Q. All right. Mr. Grantland, this is the -- if 4 you will, flip to the second page of Exhibit 36, the 5 bottom email. 6 A. Yeah. 7 Q. Is that an email that you sent to Ms. Miller 8 on May 13th -- 9 A. Yes. 10 Q. -- of 2019? 11 In this email you write, "Amy, how are you? 12 Attached is the order approving the settlement. The 13 original is on the way." 14 A. Yes. 15 Q. Is that correct? 16 All right. And then you were asked earlier 17 about this email, but just to be clear, when you -- 18 when you wrote, "The original is on the way," what -- 19 what exactly are you referring to? 20 A. He's sending me the -- the -- he's -- Cory 21 is -- I'm referring to Cory's email where he says, 22 "The original is on the way," and I'm assuming I'm 23 getting a filed original order. 24 Q. Okay. And your assumption that the original 25 order -- that Cory was going to file the original</p>
<p style="text-align: right;">Page 183</p> <p>1 I had seen it before. 2 BY MR. CLEMENT: 3 Q. Yes, sir. Okay. So, Mr. Grantland, I've 4 just placed before you Exhibit 33. 5 MR. LONG: Now, you -- you -- show me 6 Exhibit 45. 7 MR. CLEMENT: What's going on? That was 8 the one I just asked him about. 9 MR. LONG: Yeah. These are the same. 10 Yeah. So 33 and 45 are the same document. Okay? 11 MR. CLEMENT: Yeah. All right. I'm 12 looking for the one that says, "Will do, Amy," in 13 the beginning. It's in here. But we can use my 14 set if... 15 MR. LONG: "Will do," and what? 16 MR. CLEMENT: He says, "Will do, Amy. I 17 hope our paths across again." 18 MR. LONG: That's tab 38 in -- 19 MR. PENDARVIS: That's at the top of 38. 20 MR. LONG: -- Exhibit 36. Exhibit 36. 21 MR. CLEMENT: Okay. Thank you. Here we 22 go. All right. 23 All right. Just placed before 24 Mr. Grantland Exhibit -- 25 THE WITNESS: 36.</p>	<p style="text-align: right;">Page 185</p> <p>1 order was based on what? 2 A. Based on our discussions. 3 Q. Okay. And those are verbal discussions. 4 A. Right. 5 Q. Okay. And? 6 A. And, you know, there is a letter somewhere 7 where I said, "Hold it in trust, file it," and I 8 think there's a -- regarding probate court. 9 Q. Okay. 10 A. There's a -- I wrote him a letter, "Hold 11 this in trust until the order's approved and final." 12 Q. Yes, sir. And then the plan changed to 13 file -- 14 A. In state court. 15 Q. -- in state court, in the court of common 16 pleas. 17 A. Right. 18 Q. In your experience when you filed an order, 19 do you get an original back? 20 A. Well, I just meant a hard -- I mean the -- 21 whatever -- I assumed I was getting, you know, an 22 original filed order from -- from Cory. 23 Q. Okay. 24 A. I mean, I -- just, I guess, you know, I -- I 25 think when I got his email, I forwarded it on to Amy</p>

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<p>Page 186</p> <p>1 and said, "The original is on the way." Meaning, 2 whatever he's sending me, I'll be sending to her.</p> <p>3 Q. And to the best of your recollection, did 4 you ever receive the original order?</p> <p>5 A. No.</p> <p>6 Q. Okay. In any event, Ms. Miller on the first 7 page of this same email chain, at the bottom she 8 responds to you the next day. Do you see that email?</p> <p>9 A. Yes.</p> <p>10 Q. And is that an email that you received?</p> <p>11 A. Yes.</p> <p>12 Q. And she writes, "I'm well, and I hope are 13 you are too. This claim is now officially over. You 14 may close your file."</p> <p>15 I've done some insurance defense work, and 16 when an adjuster tells you to close your file --</p> <p>17 A. You close your file.</p> <p>18 Q. -- you close your file. It means you're not 19 going to get paid anymore, right?</p> <p>20 MR. MAGILL: Object to form.</p> <p>21 THE WITNESS: I didn't look at it that 22 way, but I was happy to be -- happy to close it.</p> <p>23 BY MR. CLEMENT:</p> <p>24 Q. The case is over, right?</p> <p>25 A. Right.</p>	<p>Page 188</p> <p>1 questions, but I've got two additional exhibits 2 based upon today.</p> <p>3 I'll just send them right on right now 4 and give you an opportunity to look at it if you 5 need it, Jimmy.</p> <p>6 MR. LONG: I'm not going to have access 7 to that.</p> <p>8 MR. MAGILL: Sorry. What?</p> <p>9 MR. LONG: So are you going to tell me 10 what they are?</p> <p>11 MR. MAGILL: Yeah. It's a stipulation 12 of dismissal that was filed in the petition case 13 and an email between Cory Fleming with the Court 14 that John Grantland was not on.</p> <p>15 MR. LONG: Is that about the dismissal?</p> <p>16 MR. MAGILL: Right.</p> <p>17 MR. LONG: Okay. I think I've seen 18 those before.</p> <p>19 MR. MAGILL: I'll send it to you right 20 now. We'll take ten minutes and then come back.</p> <p>21 MR. LONG: Okay.</p> <p>22 - - -</p> <p>23 (There was a recess from 2:02 to 2:14.)</p> <p>24 - - -</p> <p>25 EXAMINATION</p>
<p>Page 187</p> <p>1 Q. And when she wrote this, Ms. Miller, she 2 didn't have a original filed or copy of a filed order 3 approving the settlement; did she?</p> <p>4 A. No. Nor did I.</p> <p>5 Q. Nor did you. Okay.</p> <p>6 If you will, give me just one moment. I 7 think that is probably my last question for you.</p> <p>8 And let me ask you: Did you ever speak with 9 Chad Westendorf directly?</p> <p>10 A. I shook hands with somebody that I was -- I 11 assumed was Chad Westendorf at the mediation. That's 12 the extent of it.</p> <p>13 Q. Okay. Did you speak with anyone associated 14 with Palmetto State Bank --</p> <p>15 A. No.</p> <p>16 Q. -- during the course of your 17 representation --</p> <p>18 A. No.</p> <p>19 Q. -- of Mr. Murdaugh?</p> <p>20 A. No.</p> <p>21 MR. CLEMENT: Okay. All right. That's 22 the last question I have for you. Thank you.</p> <p>23 THE WITNESS: Thank you.</p> <p>24 MR. MAGILL: I think I'm the last one.</p> <p>25 If we can take ten minutes, I've got very brief</p>	<p>Page 189</p> <p>1 - - -</p> <p>2 BY MR. MAGILL:</p> <p>3 Q. Good afternoon, Mr. Grantland.</p> <p>4 A. Hey.</p> <p>5 Q. My name is Clinton Magill. I'm here on 6 behalf of the plaintiff in this action, Nautilus 7 Insurance Company. I appreciate your patience today. 8 I've only got a few questions.</p> <p>9 I want to start with this document Bates 10 labeled M&G00020. I believe Mr. Pendarvis marked it 11 as Exhibit 30. Do you recall testifying about this 12 document?</p> <p>13 A. Yes, sir.</p> <p>14 MR. LONG: Wait a minute. Wait a 15 minute. Exhibit 30?</p> <p>16 MR. PENDARVIS: It's in that one.</p> <p>17 MR. MAGILL: I thought that was it. If 18 it's not, let's get that right.</p> <p>19 THE WITNESS: I'm looking at it.</p> <p>20 MR. PENDARVIS: It's not the yellow 21 color, but --</p> <p>22 THE WITNESS: Yeah. It's the same.</p> <p>23 BY MR. MAGILL:</p> <p>24 Q. Okay. Can you identify this document one 25 more time?</p>

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<p style="text-align: right;">Page 190</p> <p>1 A. This is the letter, cover letter, where we 2 sent the \$3.8 million check to Cory by FedEx. 3 Q. Okay. And you instructed that the 4 settlement funds be held in trust until an order was 5 filed -- 6 A. That's correct. 7 Q. -- right? 8 A. That's correct. 9 Q. Was an order ever filed? 10 A. No. 11 Q. Do you ever authorize the release of funds 12 without the filing of an order? 13 A. No. 14 Q. You expected Mr. Fleming to file the order? 15 A. Yes. 16 Q. And that, if I understand your testimony, 17 that he would send you a copy of the filed final 18 order; is that right? 19 A. Yes. 20 Q. I want to show you this document which has 21 not been marked. 22 MR. MAGILL: What exhibit number are we 23 on, Madam Court Reporter? 24 THE STENOGRAPHER: This would be Number 25 46.</p>	<p style="text-align: right;">Page 192</p> <p>1 MR. MAGILL: The whole seven pages. I 2 apologize. CHF_0146 through 00152. 3 MR. LONG: Okay. 4 BY MR. MAGILL: 5 Q. Can you tell me what this document appears 6 to be? 7 A. Emails between Cory Fleming and Hampton 8 County. 9 Q. Okay. So you see the date? I'm going to 10 look at CHF_00146, that first page. The date that 11 this is occurring, September 30, 2020, and October 1, 12 2020, do you see that? 13 A. Yes. 14 Q. Okay. And during this time, did Mr. Fleming 15 ever reach out to you to tell you that he was 16 communicating with the Court on this case? 17 MR. PENDARVIS: Object to the form. 18 THE WITNESS: No. 19 BY MR. MAGILL: 20 Q. Okay. If you look at the third email from 21 Mr. Fleming to Tanya King and Brooks-Creech, do you 22 see that? 23 A. Yes. 24 Q. Okay. Mr. Fleming says, "This case is 25 actually settled. It keeps appearing, but no suit</p>
<p style="text-align: right;">Page 191</p> <p>1 --- 2 (Email Chain marked Exhibit Number 46 for 3 identification.) 4 --- 5 BY MR. MAGILL: 6 Q. I know you may not have a copy in front of 7 you, so -- 8 MR. LONG: He does. 9 THE WITNESS: I do. 10 MR. LONG: He does. If you want to call 11 out -- he can't read that screen that you're 12 sending him. Do you want to call out the page 13 numbers, the Bates number? 14 MR. MAGILL: Sure. CHF_00146. 15 THE WITNESS: I'm looking at it. 16 BY MR. MAGILL: 17 Q. Okay. If you can, just take a look at this 18 document, and tell me if you've ever seen this prior 19 to today. 20 A. Never seen it -- 21 MR. LONG: Go ahead and answer. 22 THE WITNESS: I've never seen it before. 23 MR. LONG: Okay. What you sent to me 24 was, like, seven pages. Are you putting the 25 whole seven pages in or just CHF_146?</p>	<p style="text-align: right;">Page 193</p> <p>1 was ever filed. We simply filed the settlement order 2 under this case number." 3 Do you see that? 4 A. Yes. 5 Q. Did I read that correctly? 6 A. Yes. 7 Q. So you are not copied on this; are you? 8 A. No. 9 Q. Okay. Can you read the response right above 10 that from the Court? 11 A. "Hey. Nothing was ever filed with us to 12 remove it from the active -- from our active docket. 13 Can you file a SOD?" Which I assume is stipulation 14 of dismissal. 15 Q. So this appears to be the Court informing 16 Mr. Fleming that nothing has been filed to remove the 17 case from the docket. Is that what you would expect 18 of the -- well, scratch that. 19 Mr. Fleming was going to file the order 20 under your understanding, correct? 21 A. That's what -- the next email says, "We need 22 to do a stipulation of dismissal. Thank you." 23 Q. Right. And this is occurring, again, in 24 September 30, 2020. They're saying, "There was 25 nothing ever filed with us to remove it from the</p>

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<p>1 active docket." Do you see that?</p> <p>2 A. Yes.</p> <p>3 - - -</p> <p>4 (Stipulation of Dismissal Dated 10/5/2020 marked</p> <p>5 Exhibit Number 47 for identification.)</p> <p>6 - - -</p> <p>7 BY MR. MAGILL:</p> <p>8 Q. Okay. I wanted to show you one more</p> <p>9 document here. And this will be Exhibit Number --</p> <p>10 which exhibit was this?</p> <p>11 A. This'll be 47.</p> <p>12 Q. 47. Thank you so much.</p> <p>13 This is a two-page document, Stipulation of</p> <p>14 Dismissal, filed in the petition action. Have you</p> <p>15 seen this prior to today?</p> <p>16 A. No.</p> <p>17 Q. Okay. Can you tell me what it appears to</p> <p>18 be?</p> <p>19 A. It's a stipulation of dismissal.</p> <p>20 Q. Okay. Who had signed this dismissal?</p> <p>21 A. Cory Fleming and, looks like, Alex.</p> <p>22 Q. Okay. Were you ever made aware of this</p> <p>23 stipulation of dismissal being filed at the time?</p> <p>24 A. No.</p> <p>25 Q. Were you ever asked for authority to enter a</p>	<p>Page 194</p> <p>1 Q. -- Fleming to send a filed order?</p> <p>2 A. Yes.</p> <p>3 MR. MAGILL: That's all the questions I</p> <p>4 have. Thank you.</p> <p>5 MR. PENDARVIS: I have a couple follow-</p> <p>6 ups.</p> <p>7 - - -</p> <p>8 REEXAMINATION</p> <p>9 - - -</p> <p>10 BY MR. PENDARVIS:</p> <p>11 Q. Mr. Fleming, back -- Mr. Grantland. Excuse</p> <p>12 me. Back to Exhibit 30, the cover letter, we were</p> <p>13 just looking at.</p> <p>14 A. Yeah.</p> <p>15 Q. I have got some specifics on the language,</p> <p>16 so you might --</p> <p>17 A. Okay.</p> <p>18 Q. -- want to get the document.</p> <p>19 A. Okay. I got it.</p> <p>20 Q. Thank you. The -- the paragraph that</p> <p>21 states, "Please hold these settlement funds in" --</p> <p>22 well, let me just read this. "Please hold these</p> <p>23 settlement funds in trust until the Petition and</p> <p>24 Order Approving Settlement have been signed and filed</p> <p>25 in the probate court settlement hearing -- at the</p>
<p>1 stipulation of dismissal?</p> <p>2 A. No.</p> <p>3 Q. Okay. At any point in time after the</p> <p>4 settlement hearing, did Mr. Fleming ever reach out to</p> <p>5 ask you why you never filed an order?</p> <p>6 A. No.</p> <p>7 Q. Would you expect him to do that if, in fact,</p> <p>8 you were supposed to file it?</p> <p>9 MR. PENDARVIS: Form, objection.</p> <p>10 MR. LONG: Objection.</p> <p>11 THE WITNESS: I assume so. That --</p> <p>12 orders are supposed to be filed.</p> <p>13 BY MR. MAGILL:</p> <p>14 Q. Right. So one last -- well, couple</p> <p>15 questions for you. You've been practicing for some</p> <p>16 time. Do you recall practicing before e-filing?</p> <p>17 A. Yes.</p> <p>18 Q. Was it typical to take two copies of filings</p> <p>19 to the court, and when you file it, they'd stamp one,</p> <p>20 and you'd file one and you keep the other.</p> <p>21 A. Yeah. I mean, something like two or three</p> <p>22 copies. It just depends on how many parties.</p> <p>23 Q. Okay. Is that generally consistent with</p> <p>24 what you meant when you said you'd expect --</p> <p>25 A. To get --</p>	<p>Page 195</p> <p>1 probate court settlement hearing," correct?</p> <p>2 A. Yes.</p> <p>3 Q. But it doesn't require for Cory Fleming --</p> <p>4 it doesn't say, "Cory Fleming, you are to file the</p> <p>5 settlement -- the petition and the order;" does it?</p> <p>6 A. That's -- but the letter is to Cory.</p> <p>7 Q. It is.</p> <p>8 A. Yeah.</p> <p>9 Q. But you were planning on attending the</p> <p>10 hearing.</p> <p>11 A. Right.</p> <p>12 Q. And it could have been that you were the one</p> <p>13 that filed it, correct?</p> <p>14 A. But I didn't.</p> <p>15 Q. But it could have been. My question is: It</p> <p>16 could have been you that got -- were there at the</p> <p>17 hearing and filed the order, correct?</p> <p>18 MR. LONG: Objection.</p> <p>19 MR. MAGILL: Objection.</p> <p>20 THE WITNESS: I mean, if I would have</p> <p>21 been at the hearing with him, that would have</p> <p>22 been the case.</p> <p>23 BY MR. PENDARVIS:</p> <p>24 Q. Okay. So this language in paragraph two on</p> <p>25 Exhibit 30 isn't specific as to who was to file the</p>

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<p style="text-align: right;">Page 198</p> <p>1 order. It just talks about having the order signed 2 and filed, correct? 3 A. That's correct. 4 Q. Okay. You mentioned something earlier. I 5 have two little other small follow-ups, 6 Mr. Grantland. You mentioned earlier about Nautilus 7 being concerned about the conservatorship. Why would 8 Nautilus care about what happened after the 9 settlement had been consummated?</p> <p>10 A. I mean, there -- it was made -- it was made 11 aware to us that one of the Satterfield boys was 12 disabled --</p> <p>13 Q. Okay.</p> <p>14 A. -- and, you know, we -- you know, that's -- 15 we wanted to make sure that if we reach a settlement 16 that he's protected.</p> <p>17 Q. Did Nautilus owe any duties to the 18 Satterfield family, Satterfield beneficiaries of 19 Ms. Gloria Satterfield's estate?</p> <p>20 A. I mean, we're trying to settle -- but we're 21 trying to settle the case and compensate. I mean, 22 we're trying to -- I don't -- I'm not sure if -- how 23 to answer that as far as whether Nautilus had a duty. 24 But, I mean, that was a concern. There's a disabled 25 adult, and we want to make sure he's protected.</p>	<p style="text-align: right;">Page 200</p> <p>1 to wherever and -- 2 A. Right. I mean, we were -- we weren't -- we 3 were kind of sequestered in our little room. With 4 the exception of me going out and talking to Alex or 5 maybe going in and talking to Cory, I wasn't privy --</p> <p>6 Q. Okay.</p> <p>7 A. -- as to what was going on in the rest of 8 the office.</p> <p>9 MR. PENDARVIS: Got no further 10 questions. Thank you.</p> <p>11 THE WITNESS: Thank you.</p> <p>12 - - -</p> <p>13 REEXAMINATION</p> <p>14 - - -</p> <p>15 BY MS. ALLEN:</p> <p>16 Q. I got -- I have just one or two. Sorry. 17 I'm sorry.</p> <p>18 You mentioned earlier there were some emails 19 where you were discussing with Amy Miller about the 20 boat crash, which I guess happened prior to the 21 mediation.</p> <p>22 A. Right.</p> <p>23 Q. Right? Not -- not too far in time. 24 Did Alex tell you who his lawyers were as it 25 relates to the boat crash --</p>
<p style="text-align: right;">Page 199</p> <p>1 Q. Okay. And one other thing that I was just 2 trying to understand. You were describing the events 3 and where everyone was at the mediation.</p> <p>4 A. Yeah.</p> <p>5 Q. And you said at one point in your testimony 6 that Cory was in one room and Mr. -- the person you 7 thought was Mr. Westendorf was in another.</p> <p>8 A. Yeah.</p> <p>9 Q. Why would they have been in separate rooms?</p> <p>10 A. I don't know.</p> <p>11 Q. How did you know they were in separate 12 rooms?</p> <p>13 A. Well, they could have been together. I just 14 know that I only met the guy I thought was Westendorf 15 once, and I went into Cory's room several times and 16 talked, and he was by himself.</p> <p>17 Q. So it could have been as Mr. Westendorf 18 testified, that he participated by telephone?</p> <p>19 A. Yeah. I mean, I -- I mean, I -- but I 20 was -- someone was represented to us as the banker, 21 so --</p> <p>22 Q. Okay.</p> <p>23 A. -- I don't know who that was. I mean, I 24 assumed it was Westendorf.</p> <p>25 Q. Or he could have appeared and then gone back</p>	<p style="text-align: right;">Page 201</p> <p>1 A. No.</p> <p>2 Q. -- case?</p> <p>3 A. No. It -- no. We -- we talked about that 4 in the context of it was a bad thing -- it was a 5 stressful thing that happened, and he was -- he was 6 already concerned about insurance.</p> <p>7 Q. Right. Did you understand that -- that the 8 Beach family or some victim in the boat crash case 9 had made -- if that -- if they had made any claims 10 against Alex or his family related to that at the 11 time of this settlement?</p> <p>12 A. Not at the time of this.</p> <p>13 Q. Okay. And so did -- so did you talk to any 14 other lawyers like at PMPED, for example, that -- 15 regarding the boat crash case and the timing of it as 16 it relates to this Satterfield settlement?</p> <p>17 A. No.</p> <p>18 Q. Okay. And Alex didn't tell you who was 19 representing him as it relates to any claims.</p> <p>20 A. No. It's -- not at all.</p> <p>21 Q. Did you understand at sometime further, you 22 know, in the future who his -- who his lawyers were 23 in the boat crash case?</p> <p>24 A. I mean, it was John Tiller, I believe. But 25 that's only just following the news.</p>

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1 Q. Okay. Alex never communicated --
2 A. No. Huh-uh.
3 Q. -- anything like that --
4 A. Huh-uh. No.
5 Q. -- to you.
6 And Cory didn't communicate with you about
7 that either.
8 A. No.
9 Q. Did Renee Dillon communicate with Alex or
10 anybody at his law firm?
11 A. Maybe relating to scheduling, but that would
12 have been --
13 Q. Okay.
14 A. -- the extent.
15 Q. And would any communications that she had
16 with Alex or anybody at PMPED have been included in
17 the subpoena responses --
18 A. Yes.
19 Q. -- that you talked about earlier?
20 A. Right.
21 MS. ALLEN: That's all I have. Thank
22 you.
23 MR. LONG: I don't have anything. We're
24 good.
25 (Witness excused. Deposition concluded at 2:28 p.m.)

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1 CERTIFICATE OF REPORTER
2 I, Deidre Osborne, Registered Professional
Reporter and Notary Public for the State of South
3 Carolina at Large, do hereby certify:
That the foregoing deposition was taken
4 before me on the date and at the time and location
stated on page 1 of this transcript; that the
5 deponent was duly sworn to testify to the truth, the
whole truth and nothing but the truth; that the
6 testimony of the deponent and all objections made at
the time of the examination were recorded
7 stenographically by me and were thereafter
transcribed; that the foregoing deposition as typed
8 is a true, accurate and complete record of the
testimony of the deponent and of all objections made
9 at the time of the examination to the best of my
ability.
10 I further certify that I am neither related
to nor counsel for any party to the cause pending or
11 interested in the events thereof. Witness my hand, I
have hereunto affixed my official seal this 20th day
12 of March, 2024, at Lexington County, South Carolina.

13
14
15 
16
17 Deidre Osborne, RPR
18 Registered Professional Reporter
Notary Public
State of South Carolina at Large
My Commission Expires:
19 June 13, 2029
20
21
22
23
24
25

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